ALLEN MATKINS LECK GAMBLE 1 MALLORY & NATSIS LLP DAVID R. ZARO (BAR NO. 124334) TIM C. HSU (BAR` NO. 279208) 515 South Figueroa Street, Ninth Floor Los Angeles, California 90071-3309 Phone: (213) 622-5555 Fax: (213) 620-8816 E-Mail: dzaro@allenmatkins.com thsu@allenmatkins.com 6 EDWARD G. FATES (BAR NO. 227809) 501 West Broadway, 15th Floor San Diego, California 92101 Phone: (619) 233-1155 Fax: (619) 233-1158 E-Maîl: tfates@allenmatkins.com 10 Attorneys for Receiver Thomas A. Seaman 11 12 UNITED STATES DISTRICT COURT 13 CENTRAL DISTRICT OF CALIFORNIA WESTERN DIVISION 14 Case No. 2:15-cv-07425 RGK GJS SECURITIES AND EXCHANGE 15 COMMISSION, FIRST INTERIM FEE 16 APPLICATION OF THE RECEIVER Plaintiff, 17 May 2, 2016 Date: V. 9:00 a.m. 18 Time: Ctrm.: 850 STEVE CHEN, USFIA, INC., Hon. R. Gary Klausner 19 Judge: ALLIANCE FINANCIAL GROUP, INC., AMAUCTION, INC., 20 ABORELL MGMT I, LLC, ABORELL 21 ADVISORS I, LLC, ABORELL REIT II, LLC, AHOME REAL 22 ESTATE, LLC, ALLIANCE NGN, INC., APOLLO REIT I, INC., 23 APOLLO REIT II, LLC, AMKEY, INC., US CHINA CONSULTATION 24 ASSOCIATION, and QUAIL RANCH 25 GOLF COURSE, LLC. 26 Defendants. 27 28

LAW OFFICES

Allen Matkins Leck Gamble

Mallory & Natsis LLP

840089.01/SD

1 Thomas A. Seaman ("Receiver"), the Court-appointed receiver for Defendants 2 USFIA, Inc., Alliance Financial Group, Inc., Amauction, Inc., Aborell Mgmt I, LLC, Aborell Advisors I, LLC, Aborell REIT II, LLC, Ahome Real Estate, LLC, Alliance NGN, Inc., Apollo REIT I, Inc., Apollo REIT II, LLC, 4 Amkey, Inc., US China Consultation Association, Quail Ranch Golf Course, LLC, 5 and their subsidiaries and affiliates (collectively, "Receivership Entities"), hereby 6 7 submits this First Interim Fee Application. This application covers the period from 8 the Receiver's appointment on September 29, 2015, through December 31, 2015 ("First Application Period"). 9 10 During the First Application Period, the Receiver and his staff spent 1,015 hours executing the duties set forth in the Temporary Restraining Order 11 entered on September 29, 2015 ("TRO"); and the subsequent Preliminary Injunction 12 Order entered on October 6, 2015 ("PI Order"). As set forth in the Receiver's 13 Second Interim Report ("Second Report"), the Receiver had recovered 14 \$21,945,974.51 in gross receipts for the receivership estate as of December 31, 15 2015. By this First Interim Fee Application, the Receiver seeks approval of 16 \$202,088.50 in fees incurred from the time of the Receiver's appointment though 17 December 31, 2015. The fees were incurred at hourly rates ranging from \$75 to 18 19 \$375 per hour and the weighted average hourly rate was \$199 per hour. The 20 Receiver seeks approval to pay 90% of this amount, or \$181,879.65. The Receiver 21 does not seek reimbursement of any expenses. 22 I. SCOPE OF THE RECEIVER'S WORK 23 The Receiver encountered highly volatile and multifaceted circumstances

The Receiver encountered highly volatile and multifaceted circumstances upon his *ex parte* appointment. Based on the Receiver's initial review of presently available data, it appears there may be as many as 100,000 potential investors, located in numerous countries, including the United States, with losses potentially in excess of \$400,000,000. The takeover and seizure of the Receivership Entities required the assistance of armed law enforcement and the U.S. Federal Marshals.

24

25

26

27

28

Defendant Steve Chen arrived at the company offices during the takeover armed with a loaded firearm and had \$45,000 cash in his possession. Additional cash was found at the company offices, an 18,000 square foot building located at 135 E. Live Oak in Arcadia, California. There were approximately 50 people at the company offices at the time of the takeover.

There were 48 bank accounts listed in the initial freeze order. As a result of the Receiver's initial investigation, 23 additional bank accounts were identified and frozen. To date, \$8,431,783.75 from 20 of these additionally identified accounts has been turned over to the Receiver. As of December 31, 2015, the Receiver had recovered funds in the amount of \$21,945,974.51. Additional funds were received in February 2016, including approximately \$5.6 million turned over by the United States Treasury, which funds had been seized prior to the appointment of the Receiver. Several subsidiaries and affiliates were also identified as set forth in the Second Report.

Numerous real property assets were identified and taken under control by the Receiver, including a 36-unit apartment building in Alhambra, a 115-room hotel in San Bernardino, and several single family residences, at least one of which could be considered a mansion. The Receiver and his staff have managed the real property assets, including supervising the hotel manager and apartment manager, collecting revenue, managing and paying vendors, collecting rents, prosecuting unlawful detainer actions, and accounting for operations.

The Receiver's initial investigation also revealed that numerous other mansions and real properties were purchased with funds of the Receivership Entities. Fraudulent transfer actions may be required to recover these properties for the benefit of the receivership estate.

A variety of personal property was also taken into the possession of the Receiver, including firearms and ammunition, five diamonds, two newer Mercedes-Benz Sprinter vans, a significant volume of amber (a material of limited

value used as ornamental jewelry), a large quantity of other ornamental jewelry apparently used in a multi-level marketing scheme. The Receiver is currently pursuing recovery of additional personal property and vehicles.

In addition, evidence of significant and voluminous payments and transfers has been identified and the Receiver is in the process of accounting for the sources and uses of these funds. Significant effort has been required to assemble bank records, including numerous subpoenas to financial institutions and purported vendors that were paid substantial amounts from the Receivership Entities.

The Receiver's work and specifically, the accounting, has been hampered and made more difficult in light of Mr. Chen's exercising his Fifth Amendment right and otherwise failing to cooperate. For example, the Receiver has had an extraordinarily difficult time assembling an investor database without guidance from Mr. Chen or Mr. Chen's staff. This has contributed to the delays and costs of the accounting and overall receivership.

#### II. SUMMARY OF RECEIVER'S FEES

Exhibit A provides a summary by timekeeper of the total fees for the First Application Period of \$202,088.50, as well as a detailed listing of every task performed by the Receiver or his agents. The fees were incurred by month as follows:

Total	\$202,088.50
December 2015	\$40,373.50
November 2015	\$65,979.50
October 2015	\$81,543.00
September 2015	\$14,192.50

During the First Application Period, the gross receipts to the receivership estate were \$21,945,974.51. The gross receipts may be summarized as follows:

Hotel revenue	\$175,441.74
Rental income	\$106,121.90
Total	\$21,945,974.51

Allen Matkins Leck Gamble Mallory & Natsis LLP

840089.01/SD -3-

The total fees as a percentage of the gross receipts were 0.9%.

In order to reduce fees, the Receiver delegates work to lower priced employees of the Receiver at rates ranging from \$75 to \$190 per hour. These employees worked 846.4 hours at an average hourly rate of \$164, bringing the weighted average hourly rate to \$199 per hour. Prior to the Receiver being nominated to serve as receiver in this matter, the Receiver agreed to discount his normal hourly rate from \$400 to \$375, which resulted in savings of \$4,215 during the First Application Period.

#### III. SUMMARY OF CHARGES BY TASK

The following summarizes the charges listed in Exhibit A by category of fees:

Accounting & Reporting	142.60	\$17,531.50
Investor Relations	49.20	8,660.50
Litigation & Support	.50	80.00
Manage Business	121.50	19,440.00
Paralegal	.80	128.00
Project Management	150.70	28,227.00
Property Management	103.50	17,042.50
Receiver	168.60	63,225.00
Receivership Administration	14.60	1,095.00
Research Files	129.90	23,979.50
Sell Property/Liquidate Assets	.30	52.00
Takeover Property	132.80	22,627.50
Total	1,015.00	\$202,088.50

Accounting and Reporting. This category covers the cost of setting up and maintaining an accounting system to account for the receipts and disbursements of the receivership estate. Tax reporting work, including establishing a Qualified Settlement Funds ("QSF") and notifying taxing authorities of the appointment of a receiver is also included in this category. For the First Application Period, 142.60 hours were spent on accounting and reporting activities for a total of \$17,531.50. The average hourly rate was \$123.00.

<u>Investor Relations</u>. This category covers the cost of communicating with investors and includes creating and updating the receivership website,

840089.01/SD -4-

<u>www.usfiareceiver.com</u>, as well as responding to inquiries from investors and interested parties by telephone, mail, and emails sent via the <u>www.usfiareceiver.com</u> website. For the First Application Period, 49.20 hours were spent on these tasks for a total of \$8,660.50. The average hourly rate was \$176.00.

Manage Business. This category relates primarily to managing the hotel in San Bernardino, which took 121.50 hours at a cost of \$19,440.00. Some of this time was non-recurring in nature, including taking possession of the hotel, due diligence, and instituting appropriate fiscal controls and supervisory functions. During the First Application Period, the hotel generated revenue of \$175,441.74 and the costs of managing the hotel was 11% of the revenue. This ratio should improve in future application periods. The average hourly rate was \$160.00.

<u>Project Management</u>. This category covers a variety of functions of managing the receivership estate and includes taking possession of bank accounts, identifying and marshalling assets, initiating subpoenas, investigating business operations and records, analyzing digital records, responding to subpoenas, managing and reviewing digital information, taking possession of real property assets, and a variety of matters required of the receivership estate. In total, 150.70 hours were expended managing the affairs of the receivership estate for a total of \$28,227.00, which equates to \$188.00 per hour.

<u>Property Management</u>. This category covers the cost of managing the estate's real property assets. During the First Application Period, 103.50 hours were spent managing real estate for a total of \$17,042.50, or \$165.00 per hour. During the First Application Period, rental income was \$106,121.90, making the fees only 16% of revenue. However, several properties that do not generate income, such as the golf course land of 860 acres, as well as single family homes where eviction actions are or were pending, required work and make the ratio of fees to revenue higher than it would customarily be. This ratio should improve in future application periods.

Receiver. This category is only used by the Receiver and includes work to manage the myriad requirements of the receivership estate. During this First Application Period, the initial seizure of the Receivership Entities, identifying and marshalling assets, investigating the nature of the enterprise and its assets, reporting to the Court, dealing with Defendant Steve Chen and interested parties, as well as developing a plan for the receivership estate were the primary focus of the Receiver's efforts. The Receiver spent 168.60 hours, or approximately 30% of his time in the First Application Period on these tasks. At his hourly rate of \$375, the total amount is \$63,225.00.

Receivership Administration. This category consumed 14.60 hours for a total of \$1,095.00, or \$75.00 per hour. The work is primarily comprised of document preservation and organization, and review of incoming mail, which provides invaluable clues to locating assets and other matters requiring the attention of the Receiver.

Research Files. This category includes investigative work in reviewing accounting and other business records to locate assets and understand the business operations. The hours worked were 129.90 for a total of \$23,979.50, or \$185.00 per hour.

Takeover Property. This category covers the cost of the seizure of the Receivership Entities including the company premises, bank accounts, and real property assets as discussed above. For the First Application Period, 132.80 hours were spent on these tasks for a total of \$22,627.50. The average hourly rate was \$170.00.

# IV. THE FEES AND COSTS ARE REASONABLE AND SHOULD BE ALLOWED

"As a general rule, the expenses and fees of a receivership are a charge upon the property administered." *Gaskill v. Gordon*, 27 F.3d 248, 251 (7th Cir. 1994). These expenses include the fees and expenses of this Receiver and his professionals,

LAW OFFICES

Allen Matkins Leck Gamble
Mallory & Natsis LLP

840089.01/SD -6-

including Allen Matkins. Decisions regarding the timing and amount of an award of fees and costs to the Receiver and his Professionals are committed to the sound discretion of the Court. *See SEC v. Elliot*, 953 F.2d 1560, 1577 (11th Cir. 1992) (*rev'd in part on other grounds*, 998 F.2d 922 (11th Cir. 1993)).

In allowing fees, a court should consider "the time, labor and skill required, but not necessarily that actually expended, in the proper performance of the duties imposed by the court upon the receiver[], the fair value of such time, labor and skill measured by conservative business standards, the degree of activity, integrity and dispatch with which the work is conducted and the result obtained." *United States v. Code Prods. Corp.*, 362 F. 2d 669, 673 (3d Cir. 1966) (internal quotation marks omitted). In practical terms, receiver and professional compensation thus ultimately rests upon the result of an equitable, multi-factor balancing test involving the "economy of administration, the burden that the estate may be able to bear, the amount of time required, although not necessarily expended, and the overall value of the services to the estate." *In re Imperial 400 Nat'l, Inc.*, 432 F. 2d 232, 237 (3d Cir. 1970). Regardless of how this balancing test is formulated, no single factor is determinative and "a reasonable fee is based [upon] all circumstances surrounding the receivership." *SEC v. W.L. Moody & Co.*, Bankers (Unincorporated), 374 F. Supp. 465, 480 (S.D. Tex. 1974).

As a preliminary matter, the TRO and PI Order confer on the Receiver substantial duties and powers, including to conduct such investigation and discovery as is necessary to locate and account for all receivership assets, take such action as is necessary and appropriate to assume control over and preserve receivership assets, and employ attorneys and others to investigate and, where appropriate, institute, pursue, and prosecute all claims and causes of action of whatever kind and nature. *See* TRO, Part XI; PI Order, Part XI.

The Receiver believes the rates and the total fees charged are reasonable in view of the challenges and circumstances encountered and respectfully requests an

order approving the total fees submitted in the amount of \$202,088.50 and ordering 1 2 an interim payment of 90% of the fees incurred, or \$181,879.65, from funds held by 3 the Receiver. Payment of the proposed 10% holdback will be sought at the conclusion of the receivership. 4 V. **CONCLUSION** 5 The Receiver, therefore, respectfully requests that the Court enter an Order: 6 7 Approving the Receiver's fees, on an interim basis, of \$202,088.50; 1. 2. Authorizing and directing the Receiver to pay himself 90% of approved 8 fees, or \$181,879.65, from the assets of the Receivership Entities; and 9 For such other and further relief as the Court deems appropriate. 10 3. 11 Dated: April 4, 2016 12 13 14 ALLEN MATKINS LECK GAMBLE Dated: April 4, 2016 15 MALLORY & NATSIS LLP 16 /s/ Edward Fates By: 17 **EDWARD FATES** Attorneys for Receiver Thomas A. Seaman 18 19 20 21 22 23 24 25 26 27 28

LAW OFFICES

Allen Matkins Leck Gamble
Mallory & Natsis LLP

840089.01/SD -8-

## **EXHIBIT A**

#### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 11 of 113 Page ID #:1985

Thomas Seaman, Receiver for Chen Fee Application 1 Summary by Timekeeper

	Hours	Rate	Total
Thomas Seaman, Receive			
September	20.1	\$375	\$7,537.50
October	74.5	, \$375	\$27,937.50
November	53.6	\$375	\$20,100.00
December	20.4	\$375	\$7,650.00
Total	168.6		\$63,225.00
Alison Juroe, Financial An	alyst		
September	25.5	\$190	\$4,845.00
October	134.5	\$190	\$25,555.00
November	91.6	\$190	\$17,404.00
December	68.8	\$190	\$13,072.00
Total	320.4		\$60,876.00
Kristen Janulewicz, CPA			
September	-	\$150	\$0.00
October	18.9	\$150	\$2,835.00
November	30.7	\$150	\$4,605.00
December	34.5	\$150	\$5,175.00
Total	84.1		\$12,615.00
5 0 5 5			
Darren Clevenger, Busine	•		Ć ( 4 0 0
September	0.4	\$160	\$64.00
October	68.3	\$160	\$10,928.00
November	57.1	\$160	\$9,136.00
December	39.6	\$160	\$6,336.00
Total	165.4		\$26,464.00
Tim McDonnell, Business	Analyst		
September	10.4	\$165	\$1,716.00
October	75.5	\$165	\$12,457.50
November	72.3	\$165	\$11,929.50
December	43.7	\$165	\$7,210.50
Total	201.9	T	\$33,313.50
1044			7 7
Matthew Flahive, Accour	ntant		
September	0.4	\$75	\$30.00
October	24.4	\$75	\$1,830.00
November	37.4	\$75	\$2,805.00
December	12.4	\$75	\$930.00
Total	74.6		\$5,595.00

#### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 12 of 113 Page ID #:1986

Total		
September	56.8	\$14,192.50
October	396.1	\$81,543.00
November	342.7	\$65 <i>,</i> 979.50
December	219.4	\$40,373.50
Total	1,015.0 \$	199 \$202,088.50

#### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 13 of 113 Page ID #:1987

Thomas Seaman Company 3 Park Plaza Suite 550 Irvine, CA 92614

Invoice submitted to: Thomas Seaman, Receiver for Chen

March 01, 2016

Invoice #11173

**Professional Services** 

			Hrs/Rate	Amount
Acco	unting & Reporting			
9/30/2015 AJ	Accounting & Reporting Review email from Chen accountant with information requested on returns that were filed, pending, payroll info, etc		0.30 190.00/hr	57.00
SUB	TOTAL:	[	0.30	57.00]
Inves	stor Relations			
9/29/2015 TM	Investor Relations Initiated website. Purchased domain and hosting services. Started home page. Gathered documents to post. Searched for license-free artwork for page. Reviewed different potential templates.		2.50 165.00/hr	412.50
9/30/2015 TM	Investor Relations Search for artwork re website template.		0.50 165.00/hr	82.50
SUB	TOTAL:	[	3.00	495.00]
Proje	ect Management			
9/28/2015 AJ	Project Management Confer with Tom re Judge approved order, discuss logistics for take over, Review order and complaint, etc.		0.80 190.00/hr	152.00

#### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 14 of 113 Page ID #:1988

Thomas Sear	man, F	Receiver for Chen			Page	2
			Hr	s/Rate	Am	<u>ount</u>
9/29/2015	AJ	Project Management Meeting with US Marshals and team to receive instruction on the entry, etc.		0.60 190.00/hr	11	4.00
	AJ	Project Management Onsite at Arcadia location for takeover. Meet with and interview employees, etc.		6.00 190.00/hr	1,14	0.00
9/30/2015	DC	Project Management Received call from Tom Seaman regarding jewelry appraisal. Located qualified appraiser and negotiated deal for Friday late morning to meet Tom. Emailed required documents and notified Tom Seaman of meeting with Charles Carmona.		0.40 160.00/hr	6	4.00
	SUBT	OTAL:	[	7.80	1,47	 [0.00]
	Recei	ver				
9/22/2015	TAS	Receiver Review draft order, suggest addition of US Marshal, discuss background, research company, reach out to US Marshal, research company online, view sales presentation, premises, google maps, yotube,		3.20 375.00/hr	1,20	00.00
9/28/2015	TAS	Receiver Coordinate US Marshal		0.70 375.00/hr		32.50
	TAS	Receiver Read Complaint		0.50 375.00/hr		37.50
	TAS	Receiver Calls with Marshal re appointment		0.30 375.00/hr		12.50
9/29/2015	TAS	Receiver Finalize US Marshal arrangements, IT consultants, locksmith, attorneys, etc, SEC re service, FBI, AUSA, preparatory work and calls		2.10 375.00/hr		37.50
	TAS	Receiver Travel time at 50% of time to and from Arcadia for takeover		1.10 375.00/hr		12.50
·	TAS	Receiver Pre-seizure preparation		1.10 375.00/hr		12.50
	TAS	Receiver Takeover over premises, terminate employees, secure, review books and records, etc		6.40 375.00/hr		00.00

#### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 15 of 113 Page ID #:1989

Thomas Sear	man, F	Receiver for Chen		F	Page 3
			_	Hrs/Rate	Amount
9/30/2015	TAS	Receiver Continue takeover, review books and records		3.50 375.00/hr	1,312.50
	TAS	Receiver Travel time at 50% of time to Arcadia		0.60 375.00/hr	225.00
	TAS	Receiver Travel time at 50% of time from Arcadia		0.60 375.00/hr	225.00
	SUBT	TOTAL:	[	20.10	7,537.50]
	Recei	ivership Administration			
9/29/2015	MRF	Receivership Administration Received directions from Thomas Seaman and made copies of the TRO and Order Appointing Receiver to take to the receivership takeover.		0.40 75.00/hr	30.00
	SUBT	TOTAL:	[	0.40	30.00]
	Rese	arch files			
9/23/2015	AJ	Research files Research entities, social media, real property title searches, etc to prepare for takeover.		3.10 190.00/hr	589.00
9/25/2015	AJ	Research files Continue to research properties, and entities related to Chen to prepare for take over. Confer with Tom re same.		1.40 190.00/hr	266.00
	SUBT	FOTAL:	[	4.50	855.00]
	<u>Take</u>	over Property			
9/29/2015	AJ	Takeover Property Prepare orders and files for take over. Draft new questionairre for employees, etc. Confer with Tom re location, time, plan, etc		1.20 190.00/hr	228.00
	AJ	Takeover Property Travel time at 50% of time to and from Arcadia for takeover		0.90 190.00/hr	171.00
9/30/2015	AJ	Takeover Property Travel time at 50% of time to and from Arcadia location.		0.70 190.00/hr	133.00

## Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 16 of 113 Page ID #:1990

Thomas Seaman	Receiver for Chen		Page 4
		Hrs/Rate	Amount
9/30/2015 AJ	Takeover Property Onsite at Arcadia location. Begin to review files, locate assets, etc.	10.50 190.00/h	1,995.00 r
9/28/2015 <b>TM</b>	Takeover Property Notified of new case, checked out web site, verified it is up. Made document of web site links for review. Discussed case needs with Tom.	0.40 165.00/h	66.00 r
9/29/2015 T <b>M</b>	Takeover Property Call from Alison to look up information on potential affiliate. Researched and sent email and text with info on other businesses.	0.40 165.00/h	66.00 r
T <b>M</b>	Takeover Property Found security guard services. Researched various potential vendors to discuss costs and availability and difficulty in getting someone on short notice. Texts and emails to Tom and Alison and guard re same. Call from guard at 11 pm re people showing up at property for cars and directed that cars stay at property.	1.10 165.00/h	181.50 r
ТМ	Takeover Property Found locksmith and arranged for service. Several calls to and from locksmith re time to arrive, calls to Tom re same.	1.20 165.00/h	198.00 r
9/30/2015 T <b>M</b>	Takeover Property Call to Tom re cars in parking lot and case status.	0.10 165.00/h	16.50 r
ТМ	Takeover Property Call from guard re vehicles and discussed what needs to happen. Text to Tom re same.	0.20 165.00/h	33.00 r
ТМ	Takeover Property Direction from Alison to send notice to banks with freeze letters. Wrote letters, gathered contact info, sent.	4.00 165.00/h	660.00 r
SUI	BTOTAL:	[ 20.70	3,748.00]
For	professional services rendered	56.80	\$14,192.50
Bala	ance due		\$14,192.50

#### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 17 of 113 Page ID #:1991

Thomas Seaman Company 3 Park Plaza Suite 550 Irvine, CA 92614

Invoice submitted to: Thomas Seaman, Receiver for Chen

March 01, 2016

Invoice #11173

#### **Professional Services**

		<u>Hrs/Rate</u>	Amount
Acco	unting & Reporting		
10/28/2015 AJ	Accounting & Reporting Call with Christine re payroll tax returns ready, etc.	0.10 190.00/hr	19.00
LA	Accounting & Reporting Review emails from Christine. Prepare and fax new voided check to the EDD. Prepare check for the payroll tax reports to be picked up tomorrow. Call Tom and leave message re same. Review quickbooks accounts. Leave note for Kristen with instruction on Hills Garden account.	0.50 190.00/hr	95.00
10/30/2015 AJ	Accounting & Reporting Review payroll returns, process returns and prepare for Tom to sign.	2,50 190.00/hr	475.00
10/5/2015 KJ	Accounting & Reporting Cut payroll checks , set up checks in Versacheck and ran E-Verify, entered deposit detail, scanned backup, called Todd regarding Hills Garden.	2.50 150.00/hr	375.00
10/6/2015 KJ	Accounting & Reporting Set up users and account settings in self-administration, gave turnover monies to Matthew to deposit, scan backup, and enter into Quickbooks.	0.70 150.00/hr	105.00
10/7/2015 KJ	Accounting & Reporting Met with Darren to discuss Accounts payable and bounced check situation at Hill Garden, cut check, emailed Aprel to discuss solution	0.70 150.00/hr	105.00

#### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 18 of 113 Page ID #:1992

Thomas Seaman, R	eceiver for Chen	P	age 2
		Hrs/Rate	Amount
	and game plan going forward.		
10/8/2015 KJ	Accounting & Reporting Cut checks for Hills Garden, correspondence with Stacy to get new account open.	2.30 150.00/hr	345.00
10/9/2015 KJ	Accounting & Reporting cut checks, added reports to pubdocs.	0.60 150.00/hr	90.00
10/12/2015 KJ	Accounting & Reporting cut checks	0.40 150.00/hr	60.00
10/14/2015 KJ	Accounting & Reporting emailed Aprel a list of invoices paid	0.20 150.00/hr	30.00
10/19/2015 KJ	Accounting & Reporting cut checks	2.20 150.00/hr	330.00
10/20/2015 KJ	Accounting & Reporting cut checks	0.40 150.00/hr	60.00
10/21/2015 KJ	Accounting & Reporting cut checks, reviewed sales reports for hotel, discussed accounting processes/procedures with Aprel.	4.50 150.00/hr	675.00
10/22/2015 KJ	Accounting & Reporting updated handful of transactions in Quickbooks.	0.60 150.00/hr	90.00
10/27/2015 KJ	Accounting & Reporting cut checks	0.60 150.00/hr	90.00
10/28/2015 KJ	Accounting & Reporting cut checks. finished credit application for Hills Garden.	1.70 150.00/hr	255.00
10/29/2015 KJ	Accounting & Reporting cut checks	0.40 150.00/hr	60.00
10/30/2015 KJ	Accounting & Reporting reviewed sales and deposit reports for Hills Garden, and brainstormed acctg for revenue/receipts with Matthew.	1.10 150.00/hr	165.00
10/6/2015 <b>M</b> RF	Accounting & Reporting Received directions from Kristen Janulewicz re depositing payment of funds seized from USFIA. Scanned in bank turnover checks, deposited payments, and made the accompanying accounting entries to Quickbooks.	1,40 75.00/hr	105.00
10/7/2015 <b>M</b> RF	Accounting & Reporting Deposited rent payments received and additional funds from bank turnovers. Received directions from Alison Juroe re class coding of funds received in Quickbooks. Revised previous entries and made	1,30 75.00/hr	97.50

Thomas Seaman, R	Receiver for Chen	F	Page 3
		Hrs/Rate	Amount
	new entries for payments received.		
10/7/2015 MRF	Accounting & Reporting Received directions and documents from Alison Juroe re properties purchased by Chen/USFIA. Reviewed property reports and created spreadsheet with pertinent information regarding each property.	2.20 75.00/hr	165.00
10/8/2015 <b>M</b> RF	Accounting & Reporting Received employee questionnaires and directions from Alison Juroe. Created spreadsheet including the important information for each employee. Reviewed questionnaires and input answers re same.	2.90 75.00/hr	217.50
MRF	Accounting & Reporting Met with Darren Clevenger re setting merchant services for the Hills Garden Hotel along with records storage for USFIA. Conference call with bankers re setting up credit card processing at Hills Garden Hotel and items needed.	0.50 75.00/hr	37.50
MRF	Accounting & Reporting Deposited rent payments received and made the accompanying entries to Quickbooks.	0.20 75.00/hr	15.00
10/9/2015 MRF	Accounting & Reporting Continued reviewing USFIA employee responses to questionnaires and input answers into spreadsheet.	2.40 75.00/hr	180.00
10/12/2015 MRF	Accounting & Reporting Reviewed documents relating to the various entities formed by Chen to conduct the various businesses. Input information on each entity to spreadsheet for tracking.	3.10 75.00/hr	232.50
10/13/2015 MRF	Accounting & Reporting Continued review of documents relating to the various entities formed by Chen to conduct the various businesses. Input information on each entity to spreadsheet for tracking.	3.30 75.00/hr	247.50
10/16/2015 MRF	Accounting & Reporting Deposited bank turnover of funds received and input to Quickbooks.	0.30 75.00/hr	22.50
10/19/2015 <b>M</b> RF	Accounting & Reporting Scanned rent checks received for the Alhambra Apartment building and deposited checks. Made the accompanying accounting entries to Quickbooks.	1.40 75.00/hr	105.00
MRF	Accounting & Reporting Contacted banker re deposit of coin and loose cash in post verify bags for the Alhambra apartments and Hills Garden Hotel. Spoke with Treasury Management rep re adding services.	0.40 75.00/hr	30.00

#### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 20 of 113 Page ID #:1994

Thomas Seaman, I	Receiver for Chen	P	age 4
		Hrs/Rate	Amount
10/20/2015 MRF	Accounting & Reporting Deposited additional apartment rent checks received and added to tracking.	0.30 75.00/hr	22.50
10/21/2015 MRF	Accounting & Reporting Setup check printing and printed checks for the Hills Garden Hotel. Conference call with Wells Fargo bankers re account services for USFIA receivership accounts.	0.70 75.00/hr	52.50
10/28/2015 <b>M</b> RF	Accounting & Reporting Counted cash seized from office in Arcadia and deposited at bank. Deposited turnover received from Chase Bank and cut check for return of defendant's personal funds seized. Called bank for instructions on return of seized funds. Drafted letter with instructions to Chase Bank re application of returned funds.	1.80 75.00/hr	135.00
10/29/2015 MRF	Accounting & Reporting Met with Kristen Janulewicz and discussed accounting entries for the daily sales reports received for Hills Garden Hotel and reconciling the income with the cash received. Deposited funds received re bank turnover demand and made the accompanying accounting entries.	0.70 75.00/hr	52.50
10/30/2015 MRF	Accounting & Reporting Revised return of funds letter to Chase Bank per Thomas Seaman's instructions and sent final draft with check to Chase.	0.40 75.00/hr	30.00
MRF	Accounting & Reporting Reviewed electronic banking files received from subpoenaed banks and began compiling matrix with details on each account.	1.10 75.00/hr	82.50
SUB	TOTAL:	[ 46.40	5,254.00]
Inves	stor Relations		
10/15/2015 AJ	Investor Relations Review website updates, confer with Tim re email forwarding	0.30 190.00/hr	57.00
10/16/2015 AJ	Investor Relations Review emails from investors, distributors	0.20 190.00/hr	38.00
10/17/2015 AJ	Investor Relations Review messages from investors	0.50 190.00/hr	95.00
10/20/2015 AJ	Investor Relations Review messages and correspondence. Confer with Tom re preparing a letter for investors.	0.70 190.00/hr	133.00
10/26/2015 AJ	Investor Relations Review messages and correspondence. Confer with Tom re letter to victims. Record new greeting on voice mail.	1.70 190.00/hr	323.00

Thomas Seaman, I	Receiver for Chen	Р	age 5
		Hrs/Rate	Amount
10/27/2015 AJ	Investor Relations Review investor messages and correspondence.	0.60 190.00/hr	114.00
10/28/2015 AJ	Investor Relations Review messages and emails. Confer with Tim re constant contact set up, etc.	0.60 190.00/hr	114.00
10/30/2015 AJ	Investor Relations Review messages and correspondence.	0.60 190.00/hr	114.00
10/5/2015 TM	Investor Relations Direction from Tom re items to post to new website. Prepared items.	0.20 165.00/hr	33.00
10/6/2015 TM	Investor Relations Load home page to Chen website. Uploaded pdfs of case to website, established and checked links. Links to PACER. Uploaded and published.	1.80 165.00/hr	297.00
10/13/2015 TM	Investor Relations Installed Constant Contact onto home page of receivership web site. Established new email for web site. Made picture for header, installed.	6.00 165.00/hr	990.00
ТМ	Investor Relations Tested new email account for web site. Received error message. Investigated.	0.20 165.00/hr	33.00
10/14/2015 TM	Investor Relations Finished Constant Contact signup. Made pictures to fit resolution and pixel requirements. Edited sign up form, initial contact list, sign-up tool to embed onto web site.	1.60 165.00/hr	264.00
TM	Investor Relations Many updates to USFIA web site.	1.70 165.00/hr	280.50
10/21/2015 TM	Investor Relations Gathered contact info of translator, email to same.	0.70 165.00/hr	115.50
TM	Investor Relations Call from translation service re need for a double-columned web site which has english on one side and chinese on the other to ensure that all future translations are easily found. Discussed type of translation, simplified (mainland China) or traditional (Taiwan). Discussed turnaround time and that she would submit proposal tomorrow.	0.20 165.00/hr	33.00
10/22/2015 TM	Investor Relations Received translation estimates and reviewed the Word documents regarding the sample of how that translations would be provided. Call to Receiver re type of translation needed, either simplified Chinese or traditional. Call to Hsu re same. Discussed how email responses will	0.60 165.00/hr	99.00

#### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 22 of 113 Page ID #:1996

Thomas Sear	man, F	Receiver for Chen		P	'age	6
				Hrs/Rate	Amo	unt
		work and future translations. Edits and sent with directions to translators.				
10/27/2015	TM	Investor Relations Email from translation services with invoice, approved and gave to Kristen for payment.		0.10 165.00/hr	16	5.50
	SUBT	OTAL:	[	18.30	3,149	9.50]
	<u>Litiga</u>	tion & Support				
10/13/2015	DC	Litigation & Support Discussed imaging of computers with Alison Juroe.		0.10 160.00/hr	16	5.00
	DC	Litigation & Support Discussed computer inventory with manager at hotel and process for having them imaged for the SEC. Received inventory list.		0.30 160.00/hr	48	3.00
	DC	Litigation & Support Sent computer list to Alison Juroe to schedule imaging.		0.10 160.00/hr	16	3.00
	SUB	TOTAL:	[	0.50	80	0.00]
	Mana	age Business				
10/1/2015	DC	Manage Business Reviewed daily reservation log and cash report. Saved to file.		0.20 160.00/hr	32	2.00
10/2/2015	DC	Manage Business Reviewed daily reservation log and cash report. Saved to file.		0.20 160.00/hr	32	2.00
10/4/2015	DC	Manage Business Drive time to hotel billed at half.		0.60 160.00/hr	96	3.00
	DC	Manage Business Drive time back from hotel billed at half.		0.60 160.00/hr	96	5.00
10/5/2015	DC	Manage Business Handled multiple issues with payroll due to banks changing. Had to approve multiple checks over the phone with local bank branches and fax documentation.	j	0.70 160.00/hr	112	2.00
	DC	Manage Business  Drive time to and from hotel from location in Corona (billed at half)		0.60 160.00/hr	96	6.00

#### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 23 of 113 Page ID #:1997

Thomas Seaman, I	Receiver for Chen	P	age 7
		Hrs/Rate	Amount
10/5/2015 DC	Manage Business Reviewed daily reservation log and cash report. Saved to file.	0.20 160.00/hr	32.00
10/6/2015 DC	Manage Business Met with Tom Seaman regarding drop in room rentals and discussed internet reservation sites.	0.20 160.00/hr	32.00
DC	Manage Business Reviewed daily reservation log and cash report. Saved to file.	0.20 160.00/hr	32.00
DC	Manage Business Searched for and reviewed articles of incorporation and relayed information to both insurance brokers in response to questions regarding status of hotel. Had two conference calls to explain and resolve the issues involving receivership, incorporation, EIN on the current policies.	0.70 160.00/hr	112.00
DC	Manage Business Continued review of the Day's Inn (Wyndam Group) contract and policies for restarting the franchise. Reviewed final report and began making list of contractors in anticipation of final punch list.	1.10 160.00/hr	176.00
DC	Manage Business Contacted vendors regarding bounced checks.	0.30 160.00/hr	48.00
DC	Manage Business Worked with the City of San Bernardino regarding both water bill. Emailed Order appointing Receiver. Relayed information to Aprel with instruction on payment.	0.50 160.00/hr	80.00
DC	Manage Business Reviewed daily reservation log and cash report. Saved to file.	0.20 160.00/hr	32.00
DC	Manage Business Searched for and reviewed articles of incorporation and relayed information to both insurance brokers in response to questions regarding status of hotel. Had two conference calls to explain and resolve the issues involving receivership, incorporation, EIN on the current policies.	0.70 160.00/hr	112.00
10/7/2015 DC	Manage Business Reviewed daily reservation log and cash report. Saved to file.	0.20 160.00/hr	32.00
DC	Manage Business Contacted multiple hotel vendors to discuss issue with payments.	0.90 160.00/hr	144.00

#### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 24 of 113 Page ID #:1998

Thomas Seaman, F	Receiver for Chen	Р	age 8
		Hrs/Rate	Amount
10/7/2015 DC	Manage Business Called water department regarding accounts.	0.40 160.00/hr	64.00
DC	Manage Business Organized all bills and had meeting with Kristen Janulewicz and created spreadsheet to aid with payment of bills and tracking potential bounced checks.	1.10 160.00/hr	176.00
10/8/2015 DC	Manage Business Worked on issues involving credit card acceptance and reviewed applications. Had call with Wells Fargo specialist.	0.80 160.00/hr	128.00
DC	Manage Business Gave instruction on collecting goods from former employee.	0.10 160.00/hr	16.00
DC	Manage Business Had additional multiple calls with credit card processor and Wells Fargo to discuss technical details.	0.30 160.00/hr	48.00
DC	Manage Business Had conference call with hotel manager and Wells Fargo to review technical aspects of current processing setup.	0.30 160.00/hr	48.00
DC	Manage Business Had conference call with Wyndam Hotel Group to discuss process for getting Day's Inn contract and timeline.	0.40 160.00/hr	64.00
DC	Manage Business Printed and reviewed earthquake insurance proposal for Hotel. Notified Receiver and scheduled meeting.	0.60 160.00/hr	96.00
DC	Manage Business Reviewed daily reservation log and cash report. Saved to file.	0.20 160.00/hr	32.00
10/9/2015 DC	Manage Business Conducted further review of Wyndam document; sent comments to Receiver.	0.80 160.00/hr	128.00
DC	Manage Business Worked on workers comp issues with State Compensation Fund and New Century Insurance Services, Inc.	0.90 160.00/hr	144.00
DC	Manage Business Reviewed daily reservation log and cash report. Saved to file.	0.20 160.00/hr	32.00
10/11/2015 DC	Manage Business Reviewed report for weekend bookings and cash deposits. Emailed questions to Heidi and April.	0.30 160.00/hr	48.00

#### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 25 of 113 Page ID #:1999

Thomas Seaman,	Receiver for Chen	P	age 9
		Hrs/Rate	Amount
10/11/2015 DC	Manage Business Began review of Days Inn contract making highlights for discussion with Receiver.	0.80 160.00/hr	128.00
10/12/2015 DC	Manage Business Reviewed daily reservation log and cash report. Saved to file. Called manager to discuss positive spike in room rentals.	0.30 160.00/hr	48.00
DC	Manage Business Discussed action plan with Tim Jauch for air conditioner repairs this week.	0.20 160.00/hr	32.00
DC	Manage Business Further review of Wyndam contract. Emailed specific questions.	1.00 160.00/hr	160.00
10/13/2015 DC	Manage Business Reviewed daily reservation log and cash report. Saved to file.	0.20 <b>1</b> 60.00/hr	32.00
DC	Manage Business Worked on issues with credit card processing.	0.30 160.00/hr	48.00
DC	Manage Business Reviewed email from Heidi Gong and answered questions relating to hotel.	0.20 160.00/hr	32.00
10/14/2015 DC	Manage Business Reviewed daily reservation log and cash report. Saved to file.	0.20 160.00/hr	32.00
DC	Manage Business Contact and email City of San Bernardino regarding contact by the Police Department and business license for hotel.	0.30 160.00/hr	48.00
DC	Manage Business Contacted Skyriver and sent Order Appointing Receiver. Discussed current contract status.	0.30 160.00/hr	48.00
DC	Manage Business Reviewed payables.	0.20 160.00/hr	32.00
DC	Manage Business Had call with hotel manager to discuss upcoming payroll and direct deposit.	0.20 160.00/hr	32.00
DC	Manage Business  Confirmed completion of round one of AC repairs at hotel. Contacted contractor to discuss next steps, budget condition of units.	0.60 160.00/hr	96.00

#### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 26 of 113 Page ID #:2000

Thomas Seaman, F	Receiver for Chen	Р	age 10
		Hrs/Rate	Amount
10/15/2015 DC	Manage Business Reviewed daily reservation log and cash report. Saved to file.	0.20 160.00/hr	32.00
DC	Manage Business Talked with hotel manager to submit payroll, answered questions regarding direct deposit; received payroll and reviewed. Forwarded to Alison Juroe.	0.30 160.00/hr	48.00
DC	Manage Business Left message and emailed Skyriver regarding internet contract for hotel.	0.10 160.00/hr	16.00
DC	Manage Business Returned call to Wyndam and sent email.	0.10 160.00/hr	16.00
DC	Manage Business Exchange multiple emails with Tuan Do regarding broker of record letter for workers comp. Printed and reviewed. Transferred to Receiver letterhead in anticipation of 11/1 renewal.	0.40 160.00/hr	64.00
10/16/2015 DC	Manage Business Reviewed documentation from Skyriver. Contacted them by phone and requested contract copy. Reviewed contract, forwarded Order appointing Receiver and discussed multiple options to lower monthly bill.	0.90 160.00/hr	144.00
DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
10/19/2015 DC	Manage Business Worked on VAR paperwork for hotel.	0.60 160.00/hr	96.00
DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
10/20/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
DC	Manage Business Worked with Shift4 regarding banking information.	0.30 160.00/hr	48.00
DC	Manage Business Reviewed earthquake policy and discussed with broker. Contacted second broker for additional quote and completed application.	1.10 160.00/hr	176.00
DC	Manage Business Wrote Broker of Record transfer letter to change workers comp broker. Obtained signature from receiver, scanned and sent to	0.40 160.00/hr	64.00

#### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 27 of 113 Page ID #:2001

Thomas Seaman, F	Receiver for Chen	Pag	ge <b>1</b> 1
		Hrs/Rate	Amount
	StateComp.		
10/20/2015 DC	Manage Business Forwarded paystubs to Aprel Glass at hotel.	0.10 160.00/hr	16.00
10/21/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
DC	Manage Business Made trip to hotel to check on progress with recent change requests. Meet with staff and check out conversion of rooms from offices to rent-able rooms.	1.10 160.00/hr	176.00
DC	Manage Business Drive time to hotel billed at half.	0.60 160.00/hr	96.00
DC	Manage Business Drive time back from to hotel billed at half.	0.70 160.00/hr	112.00
10/22/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
DC	Manage Business Worked on multiple credit applications and negotiated further with internet service provider.	1.10 160.00/hr	176.00
DC	Manage Business Completed multiple credit apps and addendums for hotel.	0.80 160.00/hr	128.00
DC	Manage Business Checked status of earth quake coverage and contacted broker.	0.20 160.00/hr	32.00
DC	Manage Business Went to hotel to investigate recent security/safety issues involving break in.	1.10 160.00/hr	176.00
DC	Manage Business Travel time to Hotel.	0.60 160.00/hr	96.00
DC	Manage Business Travel time back from Hotel.	0.60 160.00/hr	96.00
10/23/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00

Thomas Seaman, F	Receiver for Chen	Р	age 12
		Hrs/Rate	Amount
10/23/2015 DC	Manage Business Worked on new Amex acceptance application.	0.20 160.00/hr	32.00
10/24/2015 DC	Manage Business Monthly staff meeting at Hotel. Discussed rack cards, letterhead and business cards. Addressed concerns of staff regarding receivership and what is expected of them.	1.50 160.00/hr	240.00
DC	Manage Business Drive time to hotel for staff meeting.	0.70 160.00/hr	112.00
DC	Manage Business Drive time from hotel after monthly staff meeting.	0.60 160.00/hr	96.00
10/26/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
DC	Manage Business Handled multiple insurance issues related to Broker of Record letters and multiple insured names with SCIF.	0.60 160.00/hr	96.00
10/27/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
10/28/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
DC	Manage Business Conference call with Hotel to discuss security camera proposals, security guard necessity and translation of article from Chinese newspaper re Steve Chen.	0.60 160.00/hr	96.00
DC	Manage Business Printed and reviewed security camera and security guard proposals; saved to Receiver's files.	0.80 160.00/hr	128.00
10/29/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
DC	Manage Business Worked with banks and processor regarding all necessary signatures and training schedule for implementation of Shift4 software.	0.80 160.00/hr	128.00
DC	Manage Business Had conference call with Maguson Hotel Group regarding status of contract; received new addendum to contract and got signatures from Receiver. Sent back executed documents and saved to Receiver's	0.90 160.00/hr	144.00

### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 29 of 113 Page ID #:2003

Thomas Sear	nan, F	Receiver for Chen		Page	13
			Hrs/Rate	An	nount
10/30/2015	DC	files.  Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/h		32.00
	SUBT	ΓΟΤΑL:	[ 39.50	6,3	20.00]
	Proje	ct Management			
10/1/2015	AJ	Project Management Travel time at 50% of time to/ from Arcadia office	0.80 190.00/h	_	52.00
10/5/2015	AJ	Project Management Research and work on identifying assets of receivership. Confer with Tom findings, give direction re banks to contact, look up title on real estate, emails with attorneys, etc.	7.90 190.00/h		01.00
10/6/2015	AJ	Project Management Review email from David with PI and consent orders. Confer with Tom re same. Call with David Zaro to discuss additional entities.	0.50 190.00/h		95.00
	AJ	Project Management Call from attorney for Far West Bank requesting copy of PI once filed. Advise re the return of Chen cashiers check. Call with Tim to verify date mailed. Confer with Tim and advise to follow up with banks and send PI once entered.	0.20 190.00/h		38.00
	AJ	Project Management Review emails re payroll taxes, returned checks, etc. Confer with Kristen re issues with opening new account. Review emails. Scan and email addresses to Tim and Ted for serving order.	1.40 190.00/ł		66.00
	AJ	Project Management Emails with Tim Hsu re entity information needed.	0.10 190.00/h		19.00
10/7/2015	AJ	Project Management Continue to work on locating assets, give direction re accounting set up, deposits to make, letters to banks, property matrix, additional accounts/ entities located, notices to be sent, etc. Emails to attorney and team re same. Provide wire instructions to Clint per Tom.	6.40 190.00/ł		:16.00
10/8/2015	AJ	Project Management Update Tim re bank communications.	0.10 190.00/f		19.00
	AJ	Project Management Review voice message. Email to Tom re First Bank request for conformed order and EIN numbers	0.20 190.00/l		38.00

#### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 30 of 113 Page ID #:2004

Thomas Seaman, I	Receiver for Chen	Pa	age 14
		Hrs/Rate	Amount
10/8/2015 AJ	Project Management Confer with Matthew re Master matrix entries, discuss details.	0,20 190.00/hr	38.00
AJ	Project Management Draft and send email to Tim Hsu with additional information on employees contact information.	0.30 190.00/hr	57.00
AJ	Project Management Call with Lori at First Bank, get address for order, record etc.	0.20 190.00/hr	38.00
AJ	Project Management Call with Tim Hsu at Allen Matkins re status on conformed orders, notices to be sent, insider info etc.	0.30 190.00/hr	57.00
AJ	Project Management Follow up emails with Tim Hsu re additional entities, documents needed, etc. Call with Tim re same.	0.50 190.00/hr	95.00
AJ	Project Management Emails re new accounts found. Confer with Tim re same. Advise re revisions to letter. Call to BofA to discuss additional subsidiary and letter to follow. Confer with Kristen re Garden Hill merchant account. Call from BofA confirming account restricted, etc. Direction to Tim to follow up with remaining banks. Emails to team re same. Save revised bank letter from Tim H.	1.00 190.00/hr	190.00
AJ	Project Management Review email from Christine re vendor payrment returned NSF. Call Intuit to advise re receivership get info to send order etc. Provide direction to Tim re emailing same.	0.40 190.00/hr	76.00
AJ	Project Management Update bank turnover notes. Search for information on overseas bank. Email to Tim Ted and Tom re same. Review response from Tim.	0.70 190.00/hr	133.00
AJ	Project Management Met with Tom and received rent checks. Discussed cell towers, and showed report on rental income. Review new property matrix with Tom and Tom added cell towers.	0.50 190.00/hr	95.00
AJ	Project Management Confer with Matthew re deposits for rent, classes, etc. Also discuss clean up of prior entries using old classes	0.10 190.00/hr	19.00

Thomas Seaman,	Receiver for Chen	F	Page 15
		Hrs/Rate	Amount
10/9/2015 AJ	Project Management Travel time at 50% of time to/ from Arcadia office and warehouse.	0.90 190.00/hr	171.00
AJ	Project Management Review files, accounting files and quickbooks records, etc. Confer with Tom re additional location. Takeover warehouse. Calls with Tim and locksmith re same.	4.80 190.00/hr	912.00
10/12/2015 AJ	Project Management Emails with TIm and Tom re Chen case.	0.20 190.00/hr	38.00
AJ	Project Management Provide direction to Matthew re entity matrix	0.20 190.00/hr	38.00
LA	Project Management Review emails re conference call for case status	0.20 190.00/hr	38.00
AJ	Project Management Review email from David re Mo Chen attorney, confer with Tom re same.	0.40 190.00/hr	76.00
LA	Project Management Confer with Tim re Chen orders, review same.	0.30 190.00/hr	57.00
10/13/2015 AJ	Project Management Conference call with Tom, Ted, and Tim re case status, report, priorities, etc	0.70 190.00/hr	133.00
LA	Project Management Confer with Darren re hotel computers, etc.	0.20 190.00/hr	38.00
AJ	Project Management Confer with Darren re Hills Garden hotel payroll. Request wire instructions from Kristin. Call with Christine at Allied accounting. Email new bank account info for hotel payroll.	0.50 190.00/hr	95.00
AJ	Project Management Received emails from Tim Hsu with response from law firms with Chen records, Download and save to pubdocs. Review information received.	1.20 190.00/hr	228.00
10/14/2015 AJ	Project Management Confirm amounts processed through bank by payroll processor. Email and calls with payroll service re new account set up, etc	0.70 190.00/hr	133.00
10/15/2015 AJ	Project Management Confer with Darren re hotel hours. Review same and forward to Christine for processing payroll. Calls with Christine's office re same.	0.70 190.00/hr	133.00

#### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 32 of 113 Page ID #:2006

Thomas Seaman, I	Receiver for Chen	Р	age 16
		Hrs/Rate	Amount
10/15/2015 AJ	Project Management Review email from Tim Hsu re first report, items and info to provide.	0.20 190.00/hr	38.00
LA	Project Management Calls and email re payroll issues, bounced checks, etc. Provide direction to Tim re sending order and instructions re registering on website for future communications.	0.40 190.00/hr	76.00
10/16/2015 AJ	Project Management Review email with payroll for hotel. COnfer with Tom and receive approval on amount. Log in and transfer funds needed for funding. Follow up with Christine re approved.	0.70 190.00/hr	133.00
10/19/2015 AJ	Project Management Call with investor. Call with David. Review banking. Direct Tim re bank letters, records requests.	0.70 190.00/hr	133.00
10/20/2015 AJ	Project Management Review email from Mike are BRG re meeting at location. Call to Wendy - IT manager and I/m re meeting. Email to Mike re same.	0.20 190.00/hr	38.00
AJ	Project Management Forward check stubs to Darren for Hotel employees	0.10 190.00/hr	19.00
AJ	Project Management Review emails re bank freeze issues, update on forensic backup, certified order copies, banking records turnover, etc. Confer with Tom re same.	2.80 190.00/hr	532.00
10/22/2015 AJ	Project Management Call with Matthew re hills garden check and forms. Forward same to Christine for processing tax payments.	0.20 190.00/hr	38.00
10/26/2015 AJ	Project Management Review messages. Direct Tim re sending certified order to First Bank. Confer re same.	0.20 190.00/hr	38.00
AJ	Project Management Review property profiles that I requested Tim run.	0.80 190.00/hr	152.00
AJ	Project Management Confer with Tom re contractor on site at Golf course. Provide with letter and latest voice mail. Confer with Darren re phone call with Mr. Thompson.	0.60 190.00/hr	114.00
AJ	Project Management Review update email from David at BRG re: progress and access to servers and customer database. Confer with Tom re same.	0.30 190.00/hr	57.00

### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 33 of 113 Page ID #:2007

Thomas Seaman, F	Receiver for Chen	P	age 17
		Hrs/Rate	Amount
10/26/2015 AJ	Project Management Confer with Tim re utilities and insurance at the USFIA et al properties.	0.20 190.00/hr	38.00
10/27/2015 AJ	Project Management Travel time at 50% of time to Arcadia office, round trip.	0.90 190.00/hr	171.00
LA	Project Management Multiple calls with Tom to discuss next tasks, information needed, document research, report content, frozen accounts, etc.	0.30 190.00/hr	57.00
10/28/2015 AJ	Project Management Confer with Tom re Zhao. Look up and provide detail requested on amounts. Call with David re Zhao frozen accounts. Emails with David and Tom re same.	0.40 190.00/hr	76.00
AJ	Project Management Review email from David Zaro, and read attached letter from Mr. Zaccaro. Look up and provide phone number for BofA legal order processing rep.	0.20 190.00/hr	38.00
10/30/2015 AJ	Project Management Calls with Tom re Chen Quickbooks's	0.10 190.00/hr	19.00
AJ	Project Management Call with Ted re Wayne Zhao, appt for pick up and return of hand gun.	0.20 190.00/hr	38.00
AJ	Project Management Email to Tom re Wayne Zhao meeting	0.10 190.00/hr	19.00
AJ	Project Management Review email from David at BRG	0.20 190.00/hr	38.00
AJ	Project Management Review emails from David, Tom, and Tim re BofA	0.20 190.00/hr	38.00
AJ	Project Management Confer with Tim re property searches I requested, review results and gave additional instructions	0.50 190.00/hr	95.00
10/3/2015 DC	Project Management Contacted Charlie Carmona to discuss preparing appraisal report for special delivery on Saturday. Gave instruction and notified Receiver.	0.30 160.00/hr	48.00
10/15/2015 DC	Project Management Received Amkey Inc. Warehouse lease. Scanned and saved to file; emailed to Alison Juroe and Tom Seaman.	0.20 160.00/hr	32.00
10/28/2015 DC	Project Management Met with Tom Seaman regarding Quail Hills visit and caretaker's pay structure and duties; reviewed property photos.	0.40 160.00/hr	64.00

### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 34 of 113 Page ID #:2008

Thomas Seaman, Receiver for Chen		P	age 18
		Hrs/Rate	Amount
10/28/2015 DC	Project Management Organize photos taken of hotel and golf course properties. Label accordingly and save to Receiver's files.	0.80 160.00/hr	128.00
DC	Project Management Handled multiple issues relating to insurance at hotel, golf course, AHome Real Estate, Amkey and other entities. Sent off preliminary injunction to state comp and various brokers.	1.20 160.00/hr	192.00
10/6/2015 T <b>M</b>	Project Management Downloaded PACER documents on case.	0.40 165.00/hr	66.00
10/29/2015 <b>TM</b>	Project Management Downloaded and saved numerous documents from PACER re case.	0.10 165.00/hr	16.50
SUB	TOTAL:	[ 46.70	8,773.50]
Prop	erty Management		
10/26/2015 DC	Property Management Reviewed letter from Gerry Thompson (caretaker of Quail Hills Golf Course). Discussed with Tom Seaman and called Gerry Thompson to discuss ongoing relationship and current duties. Set meeting for tomorrow.	0.40 160.00/hr	64.00
10/28/2015 DC	Property Management Contact Gerry Thompson at Quail Hills regarding pay plan approval.	0.10 160.00/hr	16.00
10/5/2015 T <b>M</b>	Property Management Discussed with Darren the property management issues of the known properties.	0.20 165.00/hr	33.00
ТМ	Property Management Call from security company re length of contract. Finalized contract, spoke with Tom re same. Sent to security company.	0.50 165.00/hr	82.50
ТМ	Property Management Direction from Tom to find office leasing realtor re sub-tenant removal.	0.40 165.00/hr	66.00
ΤM	Property Management Call from tenant with maintenance issues and management needs. Discussed repairs, manager, communication, lease, etc.	0.20 165.00/hr	33.00

#### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 35 of 113 Page ID #:2009

Thomas Seaman, F	Receiver for Chen	F	Page 19
		Hrs/Rate	Amount
10/6/20 <b>1</b> 5 <b>TM</b>	Property Management Email to Whitfield re roof inspection.	0.10 165.00/hr	16.50
TM	Property Management Call from tenant re late rent, informed that late charge will apply. Took contact info.	0.10 165.00/hr	16.50
TM	Property Management Find office broker for moving sub-tenant.	0.80 165.00/hr	132.00
TM	Property Management Direction for termination of tenancy for single family homes.	0.10 165.00/hr	16.50
10/8/2015 TM	Property Management Made signage for apartment building.	0.30 165.00/hr	49.50
TM	Property Management Text to roof contractor re time to review and estimate.	0.10 165.00/hr	16.50
10/13/2015 T <b>M</b>	Property Management Made W-9 blank form for receivership and stored in pubdocs.	0.10 165.00/hr	16.50
TM	Property Management Text to contractor re roof.	0.10 165.00/hr	16.50
10/14/2015 TM	Property Management Text from contractor re roof, replied re setting up time. Email from other contractor re tax ID, replied re need for form.	0.10 165.00/hr	16.50
TM	Property Management Email from insurance broker re apartments. Replied re same.	0.10 165.00/hr	16.50
10/15/2015 TM	Property Management Call to David re rent checks. Arranged meeting.	0.10 165.00/hr	16.50
TM	Property Management Initiated electrical service at apartments. Calls to Alhambra, SoCalGas, Republic.	0.60 165.00/hr	99.00
TM	Property Management Additional calls to utilities re setting up new account, received callbacks. Took additional contact info and entered onto spreadsheet of vendors and Outlook, and phone re SoCalGas, Alhambra Public Utilities, SCE.	1.20 165.00/hr	198.00
TM	Property Management Email from Travelers with insurance info on Alhambra Gardens, printed and quick review.	0.10 165.00/hr	16.50

#### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 36 of 113 Page ID #:2010

Thomas Seaman, F	Receiver for Chen	Pa	age 20
		Hrs/Rate	Amount
10/15/2015 TM	Property Management Gathered items for trip to Alhambra re post office, utilities, site visit. Printed materials to post at site and give to David.	0.70 165.00/hr	115.50
10/16/2015 TM	Property Management Travel to and from Arcadia Post Office, Alhambra Public Utilities, Alhambra Gardens and Alhambra Post Office; at half pay.	1.60 165.00/hr	264.00
TM	Property Management Set up water and trash account with Alhambra Public Utilities.	0.40 165.00/hr	66.00
TM	Property Management Visited site to talk with manager re invoices, maintenance, emptied coin-op laundry, visited post office re rent checks sent but not received. Discussed pre-receiver bills for maintenance at homes.	2.20 165.00/hr	363.00
10/17/2015 TM	Property Management Travel to and from Alhambra Gardens; at half pay.	1.10 165.00/hr	181.50
ТМ	Property Management Meeting with Whitfield re roof repairs and other maintenance issues. Checked roof and other items such as cracks in walking areas and what repairs could be done. Gathered last of the leases for review at office and other items from manager's office. Put up signage at apartment complex re repairs and lease issues.	1.50 165.00/hr	247.50
10/19/2015 TM	Property Management Delivered coins to Matthew. Bag broke and put in other containers. Looked for rent checks envelope.	0.20 165.00/hr	33.00
TM	Property Management Attempted tracking of USPS envelope with checks, searched with Matthew and found envelope that was delivered 5 days late. Loaded check information of tenants onto tenant matrix.	0.30 165.00/hr	49.50
ТМ	Property Management Entered data of rent payments onto Tenant Matrix spreadsheet.	1.10 165.00/hr	181,50
TM	Property Management Prepared utilities deposit request and got check from Kristen. Notified Tom of status of rents and roof issue.	0.30 165.00/hr	49.50
10/21/2015 TM	Property Management Texts from and to gardener re invoices.	0.10 165.00/hr	16.50
10/22/2015 TM	Property Management Email to Whitfield re need for roof estimate.	0.10 165.00/hr	16.50
10/23/2015 TM	Property Management Made insurance spreadsheet and entered information re Alhambra Gardens.	0.30 165.00/hr	49.50

Thomas Seaman, I	Receiver for Chen	Р	age 21
		Hrs/Rate	Amount
10/23/2015 TM	Property Management Review of gas bill to check if proration made.	0.20 165.00/hr	33.00
10/24/2015 TM	Property Management Call from potential tenant re unit openings at Alhambra Gardens.	0.10 165.00/hr	16.50
10/26/2015 TM	Property Management Text to Whitfield re need for roof estimate.	0.10 165.00/hr	16.50
ТМ	Property Management Direction to get utilities changed over for 135 E. Live Oak.	0.10 165.00/hr	16.50
10/27/2015 TM	Property Management Call to apartment manager and confirmed the final rent check has been paid. Asked him to mail to me.	0.10 165.00/hr	16.50
TM	Property Management Text from contractor re roof bid.	0.10 165.00/hr	16.50
ТМ	Property Management Arranged utilities services with Arcadia Water, SCE, Trash. Long call to SoCalGas.	1.30 165.00/hr	214.50
ТМ	Property Management Made new rent statement template.	0.50 165.00/hr	82.50
TM	Property Management Summarizing leases re parking, rents, deposits. Entered numerous statement charges. Reviewed lease files to determine if any documents are missing.	3.20 165.00/hr	528.00
10/28/2015 TM	Property Management Received emails with security guard invoices, checked against paid and submitted.	0.20 165.00/hr	33.00
TM	Property Management Call from SoCalGas to arrange gas service for 135 E. Live Oak. Set up new accounts, gave contact info, explained receivership.	0.40 165.00/hr	66.00
TM	Property Management Approved gas opening bill for Alhambra Gardens. Submitted.	0.10 165.00/hr	16.50
ТМ	Property Management Reviewed unpaid invoices, discussed with Tom, separated for class, edited instructions and printed in color.	1.20 165.00/hr	198.00
ΤM	Property Management Summarizing leases re parking, rents, deposits. Entered numerous statement charges. Reviewed lease files to determine if any	1.80 165.00/hr	297.00

### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 38 of 113 Page ID #:2012

Thomas Seaman, I	Receiver for Chen		Page 22
		Hrs/Rate	Amount
	documents are missing.		
10/28/2015 TM	Property Management Searched for contractors for pest control, roofing, etc.	0.40 165.00/hr	66.00
10/29/2015 TM	Property Management Call from tenant with need for plumbing work to replace stem on faucet. Call to Contreras to approve work. Also discussed the approval of invoices for payment.	0.30 165.00/hr	49.50
TM	Property Management Email to landscaper with W-9 request.	0.10 165.00/hi	16.50
10/30/2015 TM	Property Management Calls to roofing contractors. Explained issues, took down and loaded contact info into phone and Outlook.	0,60 165.00/hi	99.00
ТМ	Property Management Call from potential tenant at Alhambra Gardens and gathered contact info.	0.20 165.00/hi	33.00
ТМ	Property Management Call to Republic re trash at 135 E. Live Oak. Email from same, replied with Injunction and gave instructions on service. Talked with Alison re needed service. Called back but agent was out.	0.50 165.00/h	82.50
10/31/2015 TM	Property Management Call from tenant in Unit K re sink clog. Call to handyman re same. Call back to tenant re appt in 40 minutes.	0.20 165.00/h	33.00 r
SUB	TOTAL:	[ 27.30	4,502.00]
Rece	eiver		
10/1/2015 TAS	Receiver Travel time at 50% of time to and from Arcadia	1.10 375.00/h	412.50 r
TAS	Receiver Continue take over, review books and records,	4.30 375.00/h	1,612.50 r
TAS	Receiver Confer with Darren re hotel takeover and management	0.40 375.00/h	150.00 r
10/2/2015 TAS	Receiver Continue takeover, locate more cash, safe contents, books and records, digital back-up	4.20 375.00/h	1,575.00 r

### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 39 of 113 Page ID #:2013

Thomas Seaman, F	Receiver for Chen	Pa	age 23
		Hrs/Rate	Amount
10/2/2015 TAS	Receiver Travel time at 50% of time from Arcadia	0.60 375.00/hr	225.00
TAS	Receiver Travel time at 50% of time to Irvine from Arcadia	0.60 375.00/hr	225.00
TAS	Receiver Compile information on hotel, Telephone call with hotel manager, direct Darren re action needed, etc; follow-up re initial findings at site, give further direction, consider banking and accounting needs,	1.20 375.00/hr	450.00
TAS	Receiver Compile information on Alhambra Gardens, Telephone call with on-site direct Tim re action needed; follow up re progress and additional direction	0.80 375.00/hr	300.00
TAS	Receiver Go to bank and deposit large volume of cash	0.70 375.00/hr	262.50
10/3/2015 TAS	Receiver Travel time at 50% of time and from to Arcadia to meet re subpoena, gemologist	1.10 375.00/hr	412.50
TAS	Receiver Meet at site re takeover, books and records, gemologist, discover new location, reconnaissance at same, other	3.60 375.00/hr	1,350.00
10/5/2015 TAS	Receiver Prepare narrative for website	0.90 375.00/hr	337.50
TAS	Receiver Receiver turnover funds, prepare email to SEC re same, direct re return of Chen funds to frozen account	0.30 375.00/hr	112.50
TAS	Receiver Confer with Darren re hotel, files and computers, staffing, etc	0.40 375.00/hr	150.00
TAS	Receiver Travel time at 50% of time to Arcadia	1.00 375.00/hr	375.00
TAS	Receiver Telephone call with Marshal's office re security, requiring another court order to assist	0.30 375.00/hr	112.50
TAS	Receiver Review documents filed on PACER, direct Tim re website update	0.40 375.00/hr	150.00

### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 40 of 113 Page ID #:2014

Thomas Seaman,	Receiver for Chen	Р	age 24
		Hrs/Rate	Amount
10/6/2015 TAS	Receiver Travel time at 50% of time to and from Arcadia	1.10 375.00/hr	412.50
TAS	Receiver Review books and records at site	5.40 375.00/hr	2,025.00
10/7/2015 TAS	Receiver Meet at site re subpoena, inventory, Quickbooks files, etc	3.20 375.00/hr	1,200.00
TAS	Receiver Travel time at 50% of time to Arcadia	0.60 375.00/hr	225.00
10/8/2015 TAS	Receiver Travel from Arcadia	0.60 375.00/hr	225.00
TAS	Receiver Telephone call with Richard re ATM	0.20 375.00/hr	75.00
TAS	Receiver Continue investigation and review of books and records in Arcadia	3.60 375.00/hr	1,350.00
TAS	Receiver Travel time at 50% of time back from Arcardia	0.60 375.00/hr	225.00
TAS	Receiver Direct Alison re First Bank turnover	0.10 375.00/hr	37.50
TAS	Receiver Review updated property list and matrix, confer with Alison re same, direct re actions needed	0.50 375.00/hr	187.50
10/9/2015 TAS	Receiver Telephone call with Don Searles and Pete Del Greco re Amkey Global, compile information showing intermingling of funds and operations	0.70 375.00/hr	262.50
TAS	Receiver Review books and records at Arcadia, set up takeover of Cloverly and take possession of and secure premises	3.60 375.00/hr	1,350.00
TAS	Receiver Travel time at 50% of time back from Arcadia and Temple City	0.60 375.00/hr	225.00
TAS	Receiver Review and sign checks for bills, review cash position, confer re Hills Garden expenses	0.40 375.00/hr	150.00

### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 41 of 113 Page ID #:2015

Thomas Seaman, F	Receiver for Chen		Page	25
		Hrs/Rate	Amo	<u>unt</u>
10/9/2015 TAS	Receiver Travel time at 50% of time to Arcadia, the Temple City	0.60 375.00/hr	225	.00
TAS	Receiver Travel time at 50% of time to	0.90 375.00/hr	337	.50
10/13/2015 TAS	Receiver Calls and emails re Mo Chen and Amkey Global, frozen accounts, operations, counsel, set meeting etc	0.60 375.00/hr	225	.00
TAS	Receiver Confernce call with counsel re status, next steps, report, etc	0.60 375.00/hr	225	.00
TAS	Receiver Review email from interested party re adding Mandarin version of website, get interpretor and give instruction re same	0.30 375.00/hr	112	50
10/14/2015 TAS	Receiver Travel time at 50% of time to Arcadia	0.50 375.00/hr	187	'.50
TAS	Receiver Meet with Mr. and Mrs. Mo Chen re Amkey Global re operations, staffing, financials; other takeover related activities at site	2.60 375.00/hr	975	i. <b>00</b>
TAS	Receiver Travel time at 50% of time to Temple City and to Irvine	0.70 375.00/hr	262	1.50
TAS	Receiver Various calls and emails re return of rifle	0.40 375.00/hr	150	0.00
10/16/2015 TAS	Receiver Review payroll, consider staffing	0.40 375.00/hr	150	0.00
10/19/2015 TAS	Receiver Telephone call with David, and review emails re same re Ally, Li Zhao frozen account, review Quickbooks report re intercompany payments, et	0.60 375.00/hr	225	5.00
TAS	Receiver Review and sign checks for bills, review cash position, give direction re costs	0.30 375.00/hr		2.50
10/20/2015 TAS	Receiver Telephone call with David re subpoena response, email preservation, IT related issues, report, banks, etc	0.50 375.00/hr		7.50
10/21/2015 TAS	Receiver Telephone call with Alison and emails with IT consultants re email, data, subpoena etc	0.40 375.00/hr		00.0

### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 42 of 113 Page ID #:2016

Thomas Seaman, F	Receiver for Chen	Pa	age 26
		Hrs/Rate	Amount
10/21/2015 TAS	Receiver Email to ATM vendor re service, service needed	0.30 375.00/hr	112.50
TAS	Receiver AdministerTracy lease termination, finalize agreement, send check	0.50 375.00/hr	187.50
TAS	Receiver Communicantions with Mr, Chang lessor of Cloverly, revie lease and pay rent	0.50 375.00/hr	187.50
TAS	Receiver Follow up on Chinese language website, direct re same	0.30 375.00/hr	112.50
TAS	Receiver Confer with Alison re Bradbury property	0.30 375.00/hr	112.50
TAS	Receiver Confer re hotel, Chart of accounts, accounting, sale journal	0.30 375.00/hr	112.50
TAS	Receiver Telephone call with Alison re Bradbury house, construction contractor not paid, final walk through pending, meeting, mechanics lien, other	0.40 375.00/hr	150.00
10/23/2015 TAS	Receiver Travel time at 50% of time to Arcadia and Carson	1.00 375.00/hr	375.00
TAS	Receiver Meet at site re computers, books and records, etc, go to Carson	3.20 375.00/hr	1,200.00
TAS	Receiver Travel time at 50% of time from Carson	0.40 375.00/hr	150.00
10/26/2015 TAS	Receiver Telephone call with ATM company re service	0.20 375.00/hr	75.00
TAS	Receiver Confer re digital data and identifying victims	0.30 375.00/hr	112.50
10/27/2015 TAS	Receiver Travel time at 50% of time to Arcadia	0.60 375.00/hr	225.00
TAS	Receiver Review books and records, review computers now up, USFIA Back Office database, Amkey, take copies	4.20 375.00/hr	1,575.00

## Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 43 of 113 Page ID #:2017

Thomas Sear	man, R	eceiver for Chen		F	age 27
			<u>+</u>	Hrs/Rate	Amount
10/27/2015	TAS	Receiver Travel time at 50% of time Arcadia to Irvine		0.60 375.00/hr	225.00
	TAS	Receiver Several calls with David re BofA, Amkey Global, other		0.60 375.00/hr	225.00
	TAS	Receiver Telephone call with ATM company re service, concerns over cash		0.30 375.00/hr	112.50
10/28/2015	TAS	Receiver Emails and calls re frozen accounts, Li Zhao,		0.50 375.00/hr	187.50
	TAS	Receiver Confer with Darren re issues at hotel, theft, security etc		0.30 375.00/hr	112.50
	TAS	Receiver Confer with Darren re Quail Ranch takeover		0.40 375.00/hr	150.00
	TAS	Receiver Telephone call with AUSA re subpoena		0.30 375.00/hr	112.50
	TAS	Receiver Preliminary review of banking records received		1.10 375.00/hr	412.50
	TAS	Receiver Telephone call with BofA re status of request for documents, will be done 11/2, Telephone call with David Zaro, confer with Alison		0.40 375.00/hr	150.00
	TAS	Receiver Telephone call with BofA order processing will not accept fax service, need to subpoena, Telephone call with counsel and direct staff re same		0.30 375.00/hr	112.50
10/30/2015	TAS	Receiver Compile evidence on Li Zhao payments, confer with Alison re same, review Quickbooks, receipts, etc, prepare list		3.40 375.00/hr	1,275.00
	TAS	Receiver Review and sign checks for bills for hotel		0.30 375.00/hr	112.50
	TAS	Receiver Telephone call with David and Ted re relief defendant additions and fraudulent transfer action		0.60 375.00/hr	225.00
	TAS	Receiver Confer re check received from frozen account in defendant's name, direct Matt re returning, revise cover letter re same		0.40 375.00/hr	150.00
	SUBT	OTAL:	[	74.50	27,937.50]

Thomas Seaman,	Receiver for Chèn	Pa	age 28
		Hrs/Rate	Amount
Rese	earch files		
10/8/2015 AJ	Research files Received thumb drive from Tom with Quickbooks files from Arcadia. Downloand, and update the Quickbooks files so that they can be opened. Run financial and other reports on each company, and run searches on specific names. Review assets on balance sheets, etc.	2.30 190.00/hr	437.00
10/12/2015 AJ	Research files Work on reviewing files, entity binders, records, property profiles, emails, etc.	5.00 190.00/hr	950.00
10/13/2015 AJ	Research files Continue to review files and research assets, entities, etc	4.60 190.00/hr	874.00
10/14/2015 AJ	Research files Met Mo Chen and attorney at Arcadia (1.3). Met with employee to retrieve personal items. (.4) Continue to review documents, records and emails, etc (1.4) Travel time at 50% of time to/ from arcadia office. (.7)	3.80 190.00/hr	722.00
10/15/2015 AJ	Research files Review documents, emails, etc. Forward wire and notes found at Arcaida office to Tim Hsu for translation. Log into marketing email and run searches, etc	4.50 190.00/hr	855.00
10/19/2015 AJ	Research files Review emails and run key word searches, etc	1.10 190.00/hr	209.00
10/20/2015 AJ	Research files Search quickbooks, emails, and other records	2.20 190.00/hr	418.00
10/21/2015 AJ	Research files Travel time at 50% of time to/ from Arcadia office, (.6), research files, offices, computers, etc. (8.2)	8.80 190.00/hr	1,672.00
10/22/2015 AJ	Research files Travel time at 50% of time to/ from Arcadia office, (.6), research files, offices, computers, etc. (8.6)	9.20 190.00/hr	1,748.00
10/23/2015 AJ	Research files Travel time at 50% of time to/ from Arcadia office, (.9), research files, offices, computers, etc. (3.4)	4.30 190.00/hr	817.00
10/27/2015 AJ	Research files Onsite at Arcadia location, continue to review documents, log into various employee computers, search files, etc. Review incoming mail. Confer with Tom re hiring former employee with knowledge of back office database.	3.80 190.00/hr	722.00

### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 45 of 113 Page ID #:2019

Thomas Sear	nan, R	teceiver for Chen		Pa	age	29
			Hrs/Rate	<u> </u>	Amo	ount
10/28/2015	AJ	Research files Review multiple quickbooks files, search records, find information on vendors, escrow agents, insiders, assets, etc. Run reports, and gather information. Also begin to review CD of bank records received.	3.40 190.00		646	5.00
10/29/2015	AJ	Research files Travel time at 50% of time to/ from Arcadia office, (.7), research files, offices, computers, etc. (5.6)	6.30 190.00		1,197	7.00
10/30/2015	AJ	Research files Continue to research files, quickbooks, records, emails, etc	4.00 190.00		760	0.00
	SUBT	OTAL:	[ 63.30	 )	12,02	7.00]
	Sell P	roperty/Liquidate Assets				
10/26/2015	ТМ	Sell Property/Liquidate Assets Call from person interested in buying the Quail Ranch Golf Club. Sent email to Receivers. Made spreadsheet with particulars.	0.20 165.00		3	3.00
	SUBT	OTAL:	[ 0.2	 O	3	3.00]
	Taked	over Property				
10/1/2015	AJ	Takeover Property Onsite at Arcadia office to continue with takeover, review documents, speak to investors, employees, creditors, etc.	10.5 190.0		1,99	5.00
10/2/2015	AJ	Takeover Property Travel time at 50% of time to / from Arcadia office.	0.9 190.0		17	1.00
	AJ	Takeover Property Continue takeover, researching banking records and other files, review quickbooks, etc.	8.2 190.0		1,55	8.00
10/1/2015	DC	Takeover Property Drive time to Hills Garden Hotel billed at half.	0.7 160.0		11	2.00
	DC	Takeover Property Drive time back from Hills Garden Hotel billed at half.	0.6 160.0		9	6.00
	DC	Takeover Property Onsite at hotel to begin take over of property. Met with employees, toured hotel, took pictures and made notes from meeting with manager. Made multiple calls to vendors and began gathering information from computers, vendors, banking info etcReviewed employee roster and determined who was positioned at Hotel post-purchase). Held one on one meetings with multiple employees.	7.5 160.0		1,20	0.00

Thomas Seaman, F	Receiver for Chen	Р	age 30
		Hrs/Rate	Amount
	Made initial list of urgent items to handle.		
10/2/2015 DC	Takeover Property Continued takeover of property. Reviewed upcoming bills and made more calls to vendors. Investigated contents of rooms set up specifically to handle business for USFIA.	3.10 160.00/hr	496.00
DC	Takeover Property Drive time to Hills Garden Hotel billed at half.	0.60 160.00/hr	96.00
DC	Takeover Property Drive time back from Hills Garden Hotel billed at half.	0.60 160.00/hr	96.00
10/4/2015 DC	Takeover Property Went to hotel with IT company, identified computers for siezure, imaged computers, and took all papers from hotel rooms converted to offices. Installed remote access software on all necessary computers and shut down all foreign remote access previously installed by USFIA. Recorded detailed information on hotel network setup and contacted vendors who were available and recorded contact information for vendors who were unavailable. Completed initial list of urgent IT items. Delivered computer equipment back to receiver's office.	2.50 160.00/hr	400.00
10/27/2015 DC	Takeover Property Went to Quail Hills Golf Course. Met with Gerry Thompson. Drove around the perimeter of the 800 acre property and took photos. Took photos of the clubhouse and retrieved certain documents to bring back to office.	3.10 160.00/hr	496.00
DC	Takeover Property Drive time to Quail Hills golf course billed at half.	0.60 160.00/hr	96.00
DC	Takeover Property Drive time from Quail Hills golf course billed at half.	0.60 160.00/hr	96.00
DC	Takeover Property Drive time to Hotel billed at half.	0.60 160.00/hr	96.00
DC	Takeover Property Drive time from Hotel billed at half (less than half).	0.90 160.00/hr	144.00
DC	Takeover Property Met with hotel manager to review photos of recent damage caused by break in and television theft. Toured facility and discussed key areas for security camers. Discussed plan for getting multiple quotes for security cameras. Had meeting to discuss pros and cons of wireless/wired, indoor/outdoor, day/night vision cameras. Made small punch list and created urgent but reasonable timeline for completion of tasks. Contacted Shift4 and verified that application process complete and training to begin the following week. Reviewed	3.50 160.00/hr	560.00

Thomas Seaman, Receiver for Chen		Pa	age 31
		Hrs/Rate	Amount
	homeless camps in the area and researched viability of installing security fence. Took extensive photos of property access points.		
10/1/2015 TM	Takeover Property Made tenant letters for takeover of apartment building. Made multiple copies. Looked up driving directions re same, property info.	1.60 165.00/hr	264.00
ТМ	Takeover Property Call from Alison re need for locksmith, call to locksmith re scheduling time today for work on the safes and desks. Text to Alison re same.	0.30 165.00/hr	49.50
ТМ	Takeover Property Delivered final freeze and turnover letters to banks. Sent by fax, sent by mail, hand delivered another.	0.70 165.00/hr	115.50
TM	Takeover Property Travel to bank and post office re turnover letters; at half pay.	0.30 165.00/hr	49.50
ТМ	Takeover Property Travel to and from Alhambra apartment building; at half pay.	1.40 165.00/hr	231.00
TM	Takeover Property Delivered turnover letters to apartment manager. Discussed needed repairs to roof and other items. Inspected roof and entrance awning and other areas needing attention. Gathered unpaid invoices, upcoming estimates. Call to Yang re management issues. Gathered 1/3rd of leases to take back to office and summarize. Reviewed items in the management office such as forms, files, supplies, etc. Took pictures of property.	3.00 165.00/hr	495.00
ТМ	Takeover Property Made pdfs of USFIA web site. Saved source code.	0.50 165.00/hr	82.50
10/2/2015 TM	Takeover Property LM and email to Yang re status of insurance. Text to Alison re same.	0.20 165.00/hr	33.00
ТМ	Takeover Property Call to Whitfield re need for roof estimate and other bids for repairs.	0.20 165.00/hr	33.00
TM	Takeover Property Looked up property information on LA County Assessor site and made pdf of info.	0.20 165.00/hr	33.00
ТМ	Takeover Property Emails from security service. Prepared for signature and checked figures for contract. Call from same.	0.40 165.00/hr	66.00

### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 48 of 113 Page ID #:2022

Thomas Seaman,	Receiver for Chen	P	age 32
		Hrs/Rate	Amount
10/2/2015 T <b>M</b>	Takeover Property Filled in rental information onto matrix.	1.10 165.00/hr	181.50
10/5/2015 TM	Takeover Property Letter to attorney for bank re additional accounts. Updated spreadsheet re amounts received. Emailed request to attorney, call to attorney to confirm all accounts. Email from attorney, forwarded to Alison. Updates to spreadsheet.	1.00 165.00/hr	165.00
ТМ	Takeover Property Direction from Alison to return check to bank for personal funds sent.	0.10 165.00/hr	16.50
10/6/2015 TM	Takeover Property Letter to Far East Bank, returned check to bank re Chen. Made scan of all items sent. Mailed.	0.40 165.00/hr	66.00
ТМ	Takeover Property Discussed apartment insurance with Tom.	0.10 165.00/hr	16.50
10/7/2015 TM	Takeover Property  Made list of items for Tom to find at headquarters. Discussed how  Quickbooks will be set up for the apartment building and tenants.	0.10 165.00/hr	16.50
TM	Takeover Property Direction to send additional freeze letters to financial institutions.	2.50 165.00/hr	412.50
TM	Takeover Property Call from Tom to find ATM vendor. Searched and called vendor to arrange call to Tom on site.	0.60 165.00/hr	99.00
10/8/2015 T <b>M</b>	Takeover Property Call from Propay with info on Amkey Global. Email to group re same.	0.20 165.00/hr	33.00
ТМ	Takeover Property Direction from Alison re Intuit	0.10 165.00/hr	16.50
TM	Takeover Property Direction from Alison re Amkey Global, made letter, sent to B of A.	1.00 165.00/hr	165.00
ТМ	Takeover Property Direction re bank account recrods request letter.	0.10 165.00/hr	16.50
10/9/2015 T <b>M</b>	Takeover Property Found locksmiths for Alison and Tom, texts to smiths and to personnel at new site.	0.20 165.00/hr	33.00

### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 49 of 113 Page ID #:2023

Thomas Seaman, F	Receiver for Chen	F	Page 33
		Hrs/Rate	Amount
10/9/2015 TM	Takeover Property Made letters for notice re Amkey, faxed, hand delivered and emailed.	4.10 165.00/hr	676.50
ТМ	Takeover Property Request from Alison re ownership of companies. Researched Secretary of State information.	0.50 165.00/hr	82.50
10/12/2015 TM	Takeover Property Attempted delivery of freeze letter to HSBC but closed for Columbus Day.	0.20 165.00/hr	33.00
ТМ	Takeover Property Checked PACER for additional filed documents and downloaded recent Preliminary Injunctions, printed and gave to Alison. Checked document against list of known bank accounts and edited spreadsheet with additional account.	0.40 165.00/hr	66.00
ТМ	Takeover Property  Made letter requesting bank statements for all found accounts.	0.40 165.00/hr	66.00
10/13/2015 TM	Takeover Property Delivered HSBC notice.	0.30 165.00/hr	49.50
TM	Takeover Property Email from Friedemann. Forwarded to Alison re Amkey Global.	0.10 165.00/hr	16.50
10/14/2015 TM	Takeover Property Direction to begin postal forwarding for Amkey Global. Call to post office re notice. Received call back and discussed. Told to call tomorrow with 16-digit number on confirmation letter.	0.60 165.00/hr	99.00
10/15/2015 TM	Takeover Property Did a Change of Address through USPS web site for Amkey Global Corp. Call to post office re same and discussed needs and told to visit the post office that is the postal carrier.	0.40 165.00/hr	66.00
ТМ	Takeover Property Initiated email forwarding to Alison re USFIA.	0.20 165.00/hr	33.00
10/16/2015 TM	Takeover Property  Made letter of instruction for post office change of address for all receivership entities.	0.40 165.00/hr	66.00
ТМ	Takeover Property Delivered instructions to Post Office re change of address request.	0.50 165.00/hr	82.50
10/19/2015 TM	Takeover Property Added accounts to accounts list spreadsheet in preparation of sending records requests.	0.30 165.00/hr	49.50

Thomas Seaman, I	Receiver for Chen	F	Page 34
		Hrs/Rate	Amount
10/19/2015 T <b>M</b>	Takeover Property Prepared request for bank records to Bank of America and faxed.	0.80 165.00/hr	132.00
ТМ	Takeover Property Notified Alison of Change of Address at Post Office re Amkey Global.	0.10 165.00/hr	16.50
10/20/2015 T <b>M</b>	Takeover Property Email and call with Hsu re having 5 certified copies sent to us.	0.10 165.00/hr	16.50
10/21/2015 TM	Takeover Property Call from Alison re employee questionnaires. Emailed to her.	0.10 165.00/hr	16.50
ТМ	Takeover Property Call from Tom re ATM servicer. Emailed contact info to him.	0.10 165.00/hr	16.50
10/23/2015 TM	Takeover Property Call from Alison with addresses to look up on Chicago Title web site. Checked three addresses and downloaded relevant profiles, transfer deeds and grant deeds. Called her back with info, printed off and put in folders.	1.00 165.00/hr	165.00
10/26/2015 <b>TM</b>	Takeover Property Direction to send new freeze and turnover letters to Bof A and First Bank. Edits regarding certified copy of order, added narrative. Sent by Fed Ex and by fax.	1.10 165.00/hr	181.50
10/28/2015 TM	Takeover Property Prepared additional address change letter for Post Office.	0.50 165.00/hr	82.50
10/29/2015 <b>TM</b>	Takeover Property Received check from B of A, notified Alison, scanned and sent to her. Gave check to Kristen for deposit. Updated spreadsheet of accounts with amounts received.	0.20 165.00/hr	33.00
ТМ	Takeover Property Ran property search in Orange County for Steve Chen and all entities, Ahome etc. (Checked on possible home in Newport Beach.) Ran for entities, started with known property owners in the case, then moved onto other entity names.	3.20 165.00/hr	528.00
10/30/2015 TM	Takeover Property Emails from Receiver and Zaro re needed service to B of A. Emailed reply re same.	0.10 165.00/hr	16.50
ТМ	Takeover Property Printed potential real estate holdings for Alison. Researched additional properties and entities.	2.80 165.00/hr	462.00

# Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 51 of 113 Page ID #:2025

Thomas Seaman,	Receiver for Chen			Page	35
			Hrs/Rate	Am	ount
10/30/2015 TM	Takeover Property Gathered contact info for BofA personnel re freeze requests and ented into Outlook, changed on fax templates.		0.10 165.00/h	•	6.50
SUB	TOTAL:	[	79.40	13,46	6.50]
For p	professional services rendered		396.10	\$81,54	3.00
Bala	nce due		•••	\$81,54	13.00

#### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 52 of 113 Page ID #:2026

Thomas Seaman Company 3 Park Plaza Suite 550 Irvine, CA 92614

Invoice submitted to: Thomas Seaman, Receiver for Chen

March 01, 2016

Invoice #11173

#### **Professional Services**

		Hrs/Rate	Amount
Acco	unting & Reporting		
11/2/2015 AJ	Accounting & Reporting Confer with Tom re payroll tax returns. Review with him and receive approval on paying and mailing. Confer with Matthew and provide direction re same.	0.50 190.00/hr	95.00
11/18/2015 AJ	Accounting & Reporting Review accounting and run reports. Confer with Matthew re statement charges, rents received, etc. Locate and print rent roll and review with Matt. Give direction on cleaning up entries, etc.	0.70 190.00/hr	133.00
11/3/2015 KJ	Accounting & Reporting cut checks, spoke with Matthew/Darren about booking of revenue, and reconciling cash	2.20 150.00/hr	330.00
11/4/2015 KJ	Accounting & Reporting cut checks	0.80 150.00/hr	120.00
11/5/2015 KJ	Accounting & Reporting Cut checks, reviewed Hills Garden credit card statement and tied out to sales report for Oct, requested bank account detail for Oct from BofA	2.60 150.00/hr	390.00
11/6/2015 KJ	Accounting & Reporting Figured out remaining entries to be made for Hills Garden and booked them, based on review of the bank detail from BofA, clarified City of San Bernardino hotel tax with Aprel, cut checks, reviewed P&L.	3.20 150.00/hr	480.00

Thomas Seaman, R	teceiver for Chen	Р	age 2
		Hrs/Rate	Amount
11/9/2015 KJ	Accounting & Reporting cut checks, did bank recons	1.30 150.00/hr	195.00
11/10/2015 KJ	Accounting & Reporting ran financials and sent to Tom	0.70 150.00/hr	105.00
11/11/2015 KJ	Accounting & Reporting cut checks, made corrections/updates to financials, per Tom's request, and ran final financials for initial report	4.80 150.00/hr	720.00
11/12/2015 KJ	Accounting & Reporting cut check, recorded hotel deposit	0.40 150.00/hr	60.00
11/13/2015 KJ	Accounting & Reporting cut checks, correspondence with Aprel/Heidi regarding bills	2.40 150.00/hr	360.00
11/16/2015 KJ	Accounting & Reporting Cut checks, entered hotel revenue.	1.50 150.00/hr	225.00
11/17/2015 KJ	Accounting & Reporting Cut checks, fixed classes for intercompany transactions, and fixed intercompany transactions between Hills Garden and USFIA.	2.70 150.00/hr	405.00
11/18/2015 KJ	Accounting & Reporting Cut checks, correspondence with Aprel, tied out merchant account receipts to deposit report.	1.80 150.00/hr	270.00
11/19/2015 KJ	Accounting & Reporting Entered hotel revenue, cut checks, correspondence with Aprel/Heidi.	1.60 150.00/hr	240.00
11/23/2015 KJ	Accounting & Reporting Cut checks	0.60 150.00/hr	90.00
11/24/2015 KJ	Accounting & Reporting cut checks	0.70 150.00/hr	105.00
11/25/2015 KJ	Accounting & Reporting cut checks	1.60 150.00/hr	240.00
11/30/2015 KJ	Accounting & Reporting Reviewed bills, cut checks	1.80 150.00/hr	270.00
11/2/2015 MRF	Accounting & Reporting Received directions from Alison Juroe re sending employee W2s and tax payments. Scanned and mailed W2s to employees. Cut tax payment checks, prepared mailings with returns and saved backup copies.	2.90 75.00/hr	217.50
MRF	Accounting & Reporting Received directions from Thomas Seaman re October accounting for the Hills Garden Hotel. Spoke with Darren Clevenger re daily reports	0.60 75.00/hr	45.00

## Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 54 of 113 Page ID #:2028

Thomas Seaman, F	Receiver for Chen	Pa	age 3
		Hrs/Rate	Amount
	received and receipt of deposits. Emailed Kristen Janulewicz re same.		
11/3/2015 MRF	Accounting & Reporting Received rent checks and payment information from Tim McDonnell re Alhambra apartments. Deposited rent checks, saved backup copies, and made the accompanying accounting entries.	1.50 75.00/hr	112.50
MRF	Accounting & Reporting Discussed accounting for the Hills Garden Hotel revenue with Kristen Janulewicz and process moving forward.	0.30 75.00/hr	22.50
11/4/2015 MRF	Accounting & Reporting Received directions from Alison Juroe re inputting payroll for the Hills Garden Hotel to Quickbooks. Received reports and reconciled bank account transactions with Quickbooks re same.	0.40 75.00/hr	30.00
11/5/2015 <b>M</b> RF	Accounting & Reporting Deposited funds received for properties owned by the receivership and made the accompanying accounting entries. Call with banker re additional banking services for USFIA & Hills Garden Hotel.	0.40 75.00/hr	30.00
MRF	Accounting & Reporting Entered the payroll for 10/20 & 11/5 pay dates to Quickbooks. Reconciled payroll tax payments and made the accompanying accounting entries.	1.40 75.00/hr	105.00
11/9/2015 MRF	Accounting & Reporting Deposited turnover of funds received from First Bank and made the accompanying accounting entries.	0.30 75.00/hr	22.50
11/10/2015 MRF	Accounting & Reporting Added additional bank account info to the matrix being created to track bank activities prior to the receivership.	0.20 75.00/hr	15.00
11/11/2015 MRF	Accounting & Reporting Reviewed bank account statements turned over from the defendant's banks and input to matrix to track movement of funds prior to receivership.	4.30 75.00/hr	322.50
MRF	Accounting & Reporting Received directions from Thomas Seaman and made accounting revisions for the 10/31 report. Worked with Kristen Janulewicz re same.	0.80 75.00/hr	60.00
11/12/2015 MRF	Accounting & Reporting Reviewed remaining bank account statements turned over from the defendant's banks and input to matrix to track movement of funds prior to receivership.	2.80 75.00/hr	210.00

### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 55 of 113 Page ID #:2029

Thomas Seaman, Receiver for Chen			P	age 4
		<u>Hr</u>	s/Rate	Amount
11/12/2015 MRF	Accounting & Reporting Deposited rent payment received from Alhambra apartments and deposited laundry machine cash at bank re same.		0.40 75.00/hr	30.00
11/13/2015 MRF	Accounting & Reporting Reviewed charges for November and met with Tim McDonnell to discuss accounting for monthly apartment rents moving forward.		0.30 75.00/hr	22.50
11/16/2015 MRF	Accounting & Reporting Reviewed bank statements turned over and updated spreadsheet with account information & balances.	•	3.60 75.00/hr	270.00
11/18/2015 MRF	Accounting & Reporting Received directions from Alison Juroe re sorting bank statements and revising accounting for Alhambra apartment rents. Reviewed rents received in Quickbooks to revise.		0.80 75.00/hr	60.00
MRF	Accounting & Reporting Deposited bank turnover received, scanned in turnover information and made the accompanying accounting entries.		0.40 75.00/hr	30.00
11/19/2015 <b>M</b> RF	Accounting & Reporting Created spreadsheet of monthly rental charges per unit, revised accounting for payment received and booked statements charges for November rents. Conferred with Tim McDonnell re same.		1.10 75.00/hr	82.50
MRF	Accounting & Reporting Received November rents for the Alhambra apartments, deposited, and made the accompanying accounting entries. Prepared deposit for coin received from laundry machines on-site. Spoke with Tim McDonnell re same.		1.40 75.00/hr	105.00
11/20/2015 MRF	Accounting & Reporting Input payroll for the period ending 11/15/15 to Quickbooks for the Hills Garden Hotel.		0.70 75.00/hr	52.50
MRF	Accounting & Reporting Calculated fedex, website hosting, and Pacer fees paid on behalf of USFIA and cut check for reimbursement.		0.30 75.00/hr	22.50
11/23/2015 MRF	Accounting & Reporting Deposited turnover of funds received from bank and saved backup copy.		0.30 75.00/hr	22.50
SUBT	TOTAL:	[	57.10	6,723.00]

Thomas Sear	man, I	Receiver for Chen		Р	age 5
				Hrs/Rate	Amount
	Inves	tor Relations			
11/4/2015	AJ	Investor Relations Review messages and correspondence.		0.70 190.00/hr	133.00
11/5/2015	AJ	Investor Relations Review messages and correspondence.		0.80 190.00/hr	152.00
11/9/2015	AJ	Investor Relations Review messages and correspondence, confer with postings, etc.	Tim re website	0.70 190.00/hr	133.00
11/11/2015	AJ	Investor Relations Review messages and correspondence.		0.40 190.00/hr	76.00
11/12/2015	AJ	Investor Relations Review messages and correspondence from investo etc.	rs, distributors,	1.00 190.00/hr	190.00
11/13/2015	AJ	Investor Relations Review messages and correspondence. Confer with	Tom re same.	0.70 190.00/hr	133.00
11/16/2015	AJ	Investor Relations Review messages and correspondence. Inquire are web site and email to be sent to subscribers.	posting report to	0.70 190.00/hr	133.00
11/18/2015	AJ	Investor Relations Review messages, etc		0.90 190.00/hr	171.00
11/19/2015	AJ	Investor Relations Review messages and correspondence. Inquire with posting report.	Tim again re	0.40 190.00/hr	76.00
11/3/2015	MT	Investor Relations Met with investor representative and gave him copy with contact information. Answered basic questions a info to pass on to the Receiver.	of Court order and took contact	0.30 165.00/hr	49.50
11/4/2015	TM	Investor Relations Call to investor re info discussed the day before. Em Alison re same.	ail to Tom and	0.30 165.00/hr	49.50
11/6/2015	тм	Investor Relations Put up Chinese language material on the web site.		4.20 165.00/hr	693.00
11/9/2015	тм	Investor Relations Direction from Tom to change the header picture. Ec	lits in PowerPoint.	0.40 165.00/hr	66.00
11/11/2015	тм	Investor Relations Email from investor re difficulty signing up for email univestor re problem to find solution.	updates. Called	0.10 165.00/hr	16.50

### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 57 of 113 Page ID #:2031

Thomas Sear	nan, R	Receiver for Chen		Page 6
			Hrs/Rate	Amount
11/17/2015	TM	Investor Relations Email from investor asking to be added to web site list. Added and sent email to him re same.	0.20 165.00/h	33.00 or
11/19/2015	TM	Investor Relations Posted update of First Report to the web site. Sent request to translation unit for Chinese Simplified version.	1.10 165.00/f	181.50 nr
	ТМ	Investor Relations Prepared first email for First Report. Made template. Trouble sending email as the account has too many subscribers. Attempted to buy more credit to send email. Call to NS. Long hold times. Approved to send new emails and sent out to subscribers.	1.80 165.00/t	297.00 nr
11/20/2015	ТМ	Investor Relations Email to group of confirming first email sent. Suggestion for some translation to start before future postings. Logged onto Constant Contact to determine number of contact, etc. Site was having difficulty.	0.30 165.00/i	49.50 nr
	ТМ	Investor Relations Sent instructions re translations of Court documents. Call with translator re same. Sent W-9 to translator. Received W-9 and turned in to accounting. Received estimate, discussed with Tom and approved.	0.40 165.00/l	66.00 nr
	TM	Investor Relations Received translations for posting.	0.10 165.00/	16.50 nr
	ТМ	Investor Relations Email to SEC re need for Word document of previous Court documents. Received email with same and additional documents.	0.10 165.00/	16.50 nr
	TM	Investor Relations Email to Hsu re getting Word document of First Report.	0.10 165.00/	16.50 hr
11/23/2015	ТМ	Investor Relations Changes to web site adding the stipulation and explanation of what Alliance corporation is in receivership. Email to translator re minor changes.	1.70 165.00/	280.50 hr
	SUBT	ΓΟΤΑL:	[ 17.40	3,028.50]
	<u>Mana</u>	ige Business		
11/2/2015	DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel for Friday, Saturday and Sunday. Scanned and saved to	0.40 160.00/	64.00 hr

Thomas Seaman, F	Receiver for Chen	F	age 7
		Hrs/Rate	Amount
	Receiver's files; forwarded to accounting.		
11/2/2015 DC	Manage Business Conference call with San Bernardino city attorney's office.	0.40 160.00/hr	64.00
DC	Manage Business Exchanged multiple emials and had call with city clerk regarding operator's permit. Requested copies of Steve Chens paperwork in progress and discussed next steps due to receivership.	0.80 160.00/hr	128.00
DC	Manage Business Reviewed list of bills for hotel; met with Kristen Janulewicz regarding payment. Relayed information to hotel manager.	0.30 160.00/hr	48.00
DC	Manage Business Worked with Shift 4 regarding contract finalization.	0.60 160.00/hr	96.00
11/3/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
DC	Manage Business Received paperwork regarding guest injury at hotel. Contacted insurance company to discuss. Reviewed guest statement and interviewed hotel manager.	1.10 160.00/hr	176.00
11/4/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
DC	Manage Business Had call with San Bernardion PD regarding live scan procedure and request form.	0.30 160.00/hr	48.00
DC	Manage Business Had conference call with City Attorney office of San Bernardino regarding citation issued for operating without a license or operators permit; emailed paperwork and had follow up call.	0.70 160.00/hr	112.00
DC	Manage Business Had call with Vice department for City of San Bernardino regarding procedure for properly securing necessary licenses for city and operators permit. Received instructions, paperwork and contact numbers.	0.40 160.00/hr	64.00
11/5/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00

### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 59 of 113 Page ID #:2033

Thomas Seaman, F	Receiver for Chen	F	age 8
		Hrs/Rate	Amount
11/5/2015 DC	Manage Business Drive time to Hills Garden Hotel billed at half.	0.60 160.00/hr	96.00
DC	Manage Business Drive time from Hills Garden Hotel billed at half.	0.70 160.00/hr	112.00
DC	Manage Business Onsite at hotel supervising changes to Internet access, assisting with setup and testing of work stations installing new Shift 4 software; met with Aprel and staff about short and long term concerns. Met with IT vendor and made short list of goals to accomplish prior to going live with Shift 4.	5.40 160.00/hr	864.00
11/6/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
DC	Manage Business Drive time to hotel for additional Shift 4 supervision.	0.60 160.00/hr	96.00
DC	Manage Business Drive time from hotel for additional Shift 4 supervision.	0.70 160.00/hr	112.00
DC	Manage Business Onsite for 4 hours supervising and assisting with additional issues related to Shift 4 transfer. Had conference call with Magnuson hotels. Ran tests with Shift 4. Granted admin rights to computers in lobb to allow for Shift 4 updates. Reviewed bills with Heidi and Aprel.	4.50 160.00/hr	720.00
11/9/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel for Friday, Saturday and Sunday. Scanned and saved to Receiver's files; forwarded to accounting.	0.40 160.00/hr	64.00
DC	Manage Business Reviewed online room reservations report.	0.20 160.00/hr	32.00
11/10/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
11/11/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
DC	Manage Business Worked on Amex acceptance application for hotel; sign, scan and send.	0.40 160.00/hr	64.00

### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 60 of 113 Page ID #:2034

Thomas Seaman, Receiver for Chen			Page 9
	-	Hrs/Rate	Amount
11/12/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
DC	Manage Business Had conference call for training on RoomKey PMS for hotel. Set up user account and ran reports.	0.60 160.00/hr	96.00
DC	Manage Business Had conference call with Magnuson Hotels and reviewed reports from first two days of being live with new system. Reviewed potential reports and requested weekly delivery of specific data points.	0.70 160.00/hr	112.00
DC	Manage Business Forwarded pay check stubs to Aprel Glass.	0.10 160.00/hr	16.00
DC	Manage Business Forwarded reservation spreadsheet to Matthew Flahive.	0.10 160.00/hr	16.00
DC	Manage Business Requested reservation spreadsheet from hotel.	0.10 160.00/hr	16.00
DC	Manage Business Review insurance certificate received from hotel gardener. Confirm information and relay to hotel management; scan and save to Receiver files.	0.20 160.00/hr	32.00
11/13/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
DC	Manage Business Had conference call with Aprel Glass at hotel to discuss progress with new system and reservation outlook for the holidays.	0.30 160.00/hr	48.00
DC	Manage Business Sent copy of voided check and additional information regarding Amex application to Aprel Glass.	0.10 160.00/hr	16.00
DC	Manage Business Looked into mysterious email sent by former hotel employee.	0.10 160.00/hr	16.00
11/16/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel for Saturday and Sunday. Scanned and saved to Receiver's	0.30 160.00/hr	48.00

### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 61 of 113 Page ID #:2035

Thomas Seaman, I	Receiver for Chen	Р	age 10
		Hrs/Rate	Amount
	files; forwarded to accounting.		
11/16/2015 DC	Manage Business Received email from incumbent broker regarding policies for USFIA Inc., AHome Real Estate Investments and Amkey Inc. Called SCIF regarding policies and exchanged calls and emails with broker regarding policy cancellations.	0.60 160.00/hr	96.00
DC	Manage Business Had conference call with Charter Cable regarding internet contract and cancellation.	0.30 160.00/hr	48.00
DC	Manage Business Sent preliminary injunction to Charter cable and had follow up call.	0.20 160.00/hr	32.00
DC	Manage Business Sent current internet contract to Charter.	0.10 160.00/hr	16.00
DC	Manage Business Received email from hotel regarding Charter Cables internet contract and scheduling request. Requested copy of work order.	0.20 160.00/hr	32.00
11/17/2015 DC	Manage Business Prepare all documents for Tom Seaman for his trip to San Bernardino Police Department for live scan and paper work completion for business license and hotel operators permit for city and county of San Bernardino including maps, appointment times, numerous copies of paperwork and preliminary injunctions, directions, contact names and meeting times.	0.90 160.00/hr	144.00
DC	Manage Business Had conference call with Victor Alemon from City Attorney's office regarding fine, operators permit and live scan. Received complete instructions and steps (in order of completion) for live scan, license, operators permit, fine acknowledgment and citation adjustment.	0.60 160.00/hr	96.00
DC	Manage Business Had call with San Bernardino Police department regarding citation on next steps.	0.20 160.00/hr	32.00
DC	Manage Business Reviewed new bill from Skyriver and had call with local rep.	0.20 160.00/hr	32.00
DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00

Thomas Seaman, I	Receiver for Chen	P	age 11
	-	Hrs/Rate	Amount
11/18/2015 DC	Manage Business Drive time to hotel for company meeting.	0.60 160.00/hr	96.00
DC	Manage Business Drive time from hotel after company meeting.	0.60 160.00/hr	96.00
DC	Manage Business Had company meeting and reviewed room key reports. Met with Aprel and Heidi regarding uptick in reservations due to new software. Began planning of initial cosmetic improvements to hotel.	2.00 160.00/hr	320.00
DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
11/19/2015 DC	Manage Business Emailed follow up offer to Skyriver regarding internet.	0.10 160.00/hr	16.00
DC	Manage Business Reviewed issues and reports related to workers comp at Hills Garden Hotel.	0.40 160.00/hr	64.00
DC	Manage Business Rescheduled staff meeting for hotel.	0.10 160.00/hr	16.00
DC	Manage Business Created spreadsheet for creating workers comp reports.	0.30 160.00/hr	48.00
DC	Manage Business Comprehensively reviewed workers comp proposal, rate and premium. Obtained signatures and arranged payment to assure immediate binding. Exchanged multiple emails and had multiple calls with broker.	0.60 160.00/hr	96.00
DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
11/20/2015 DC	Manage Business  Met with broker regarding workers comp to finalize payment terms, pass originals and discuss claims history, rate and stipulated premium vs. monthly reporting.	0.80 160.00/hr	128.00
DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
11/21/2015 DC	Manage Business Reviewed contracts and cancellation clauses for all three internet providers at hotel.	0.40 160.00/hr	64.00

Thomas Seaman, I	Receiver for Chen	P	age 12
	-	Hrs/Rate	Amount
11/21/2015 DC	Manage Business Composed emails for compromised offers to all three internet vendors.	0.30 160.00/hr	48.00
11/22/2015 DC	Manage Business Travel time to Hills Garden Hotel billed at half.	0.60 160.00/hr	96.00
DC	Manage Business Travel time from Hills Garden Hotel billed at half.	0.60 160.00/hr	96.00
DC	Manage Business Onsite at hotel to review progress with new Room Key software. Worked with numerous employees and began comprehensive review of items in need of improvement/repair (painting, patching etc).	2.50 160.00/hr	400.00
11/23/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel for Saturday and Sunday. Scanned and saved to Receiver's files; forwarded to accounting.	0.30 160.00/hr	48.00
DC	Manage Business Met with insurance broker for hotel comp; discussed various renewal/coverage options, stipulated vs. monthly calculated premium. Discussed additional insurance needs as well.	0.90 160.00/hr	144.00
11/24/2015 DC	Manage Business Prepared documents for Receiver's trip to Arcadia for live scan, license application, and operators permit. Reviewed and highlighted all signature areas and completed majority of items (minus signature).	0.60 160.00/hr	96.00
DC	Manage Business Obtained signature for lodging tax form, scanned and emailed.	0.20 160.00/hr	32.00
DC	Manage Business Had call with City of San Bernardino regarding procedures for Receiver's meeting tomorrow.	0.40 160.00/hr	64.00
DC	Manage Business Had multiple calls and emails negotiating reduced internet contract for hotel including contract revisions and multiple email exchanges.	0.50 160.00/hr	80.00
DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
11/25/2015 DC	Manage Business Ran internet speed tests and finalized negotiations with Skyriver regarding internet contract with Hotel. This included meeting with Receiver to discuss proposal, multiple phone calls and several emails	1,40 160.00/hr	224.00

Thomas Seaman, F	Receiver for Chen	Pa	age 13
•		Hrs/Rate	Amount
	to bring to resolution.		
11/25/2015 DC	Manage Business Negotiated payment terms for cancellation of vendor contract for internet.	0.40 160.00/hr	64.00
DC	Manage Business Met with Kristen Janulewicz regarding skyriver and passed along wiring instructions for cancellation of contract.	0.20 160.00/hr	32.00
DC	Manage Business Requested and received historical sales numbers for hotel for prior 4 years. Created spreadsheet analyzing numbers on an annual basis comparing and contrasting on a month by month basis. Saved to Receiver's files.	1.40 160.00/hr	224.00
DC	Manage Business Had conference call with hotel manager and Kristen Janulewicz to discuss spreadsheet numbers for historical hotel sales.	0.30 160.00/hr	48.00
DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
11/27/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
11/30/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel for Saturday and Sunday. Scanned and saved to Receiver's files; forwarded to accounting.	0.30 160.00/hr	48.00
DC	Manage Business Had conference call with Assistant City Attorney for City of San Bernardino regarding civil penalty. Discussed options and hearing procedures.	0.40 160.00/hr	64.00
DC	Manage Business Received hearing notice on civil penalty for Hills Garden Hotel. Scanned to Receiver's files.	0.20 160.00/hr	32.00
DC	Manage Business Reviewed report for website traffic and hotel reservations sent from Magnusen hotels.	0.20 160.00/hr	32.00
DC	Manage Business Had second call with Assistant City Attorney for City of San Bernardino after forwarding necessary paperwork; Gave background	0.30 160.00/hr	48.00

### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 65 of 113 Page ID #:2039

Thomas Sear	nan, F	Receiver for Chen		F	age °	14
*		•		Hrs/Rate	Am	<u>ount</u>
		of case discussed steps we have taken, sent paperwork				
11/30/2015	DC	Manage Business Met with Tom Seaman regarding civil penalty; explained circumstances and requested that I attend.		0.10 160.00/hr	1	6.00
	DC	Manage Business Responded to civil penalty hearing notice; informed them who would attend hearing.		0.10 160.00/hr	1	6.00
	SUBT	TOTAL:	[	45.70	7,31	2.00]
	Paral	egal				
11/13/2015	DC	Paralegal Reviewed Receiver's 1st status report. Obtained Receiver's signature, scanned and send back to counsel.		0.20 160.00/hr	3	2.00
11/24/2015	DC	Paralegal Download recently filed documents off Pacer for receiver's files and for posting on receivership website.		0.60 160.00/hr	ę	96.00
	SUBT	TOTÄL:	[	0.80	12	28.00]
	<u>Proje</u>	ct Management				
11/2/2015	AJ	Project Management Review emails from counsel re bank subpoenas. Confer with Tom re same.		0.20 190.00/hr	3	38.00
	AJ	Project Management Confer with Tom re additional properties to add to matrix, review evidence found, Tom to email attorney's re same		0.20 190.00/hr	;	38.00
11/3/2015	AJ	Project Management Emails with accountant re payroll for Hotel. Emails to team re funding recording same.	,	0.40 190.00/hr	-	76.00
11/4/2015	AJ	Project Management Email to former employee re meeting for removal of personal items.		0.10 190.00/hr	•	19.00
	AJ	Project Management Begin to review docs received from BofA pursuant to subpoena.		2.80 190.00/hr	5	32.00
11/5/2015	AJ	Project Management Orgainze and scan bank records received from BofA on Ally acct. Email to Ted.		0.60 190.00/hr	1	14.00

### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 66 of 113 Page ID #:2040

Thomas Seaman, I	Receiver for Chen	Pa	age 15
		Hrs/Rate	Amount
11/5/2015 AJ	Project Management Review emails from counsel and respond.	0.10 190.00/hr	19.00
AJ	Project Management Calls with Tom re office in New York	0.30 190.00/hr	57.00
11/6/2015 AJ	Project Management Call with Tom re banking records, subpoena production, etc	0.40 190.00/hr	76.00
AJ	Project Management Review email from Ted with letter from Chen's counsel.	0,20 190.00/hr	38.00
LA	Project Management Continue to review files and examine bank records turned over by bofa. Search files and quickbooks for relevant information. Prepare and send summary of Ally account findings to counsel. Prepare and send additional properties located to counsel.	3.90 190.00/hr	741.00
11/9/2015 AJ	Project Management Meet with Tom and Tim to review real estate, insurance, etc.	0.60 190.00/hr	114.00
AJ	Project Management Meet with Tom re staffing, information needed for report, banking records, etc	0.60 190.00/hr	114.00
AJ	Project Management Searched records and located leases for Tim.	0.40 190.00/hr	76.00
AJ	Project Management Email to employee re meeting time for picking up personal items.	0.10 190.00/hr	19.00
11/10/2015 AJ	Project Management Review property list, tenant names, etc. Research files on utility payments, etc. Confer with Tim re 4116 Lynd.	1.40 190.00/hr	266.00
11/11/2015 AJ	Project Management Confer with Matthew re additional entities. Provide records re same and direction re updating matrix.	0.40 190.00/hr	76.00
AJ	Project Management Travel time at 50% of time to and from Arcadia office.	1.00 190.00/hr	190.00
AJ	Project Management Onsite at the Arcaida office. Meet with guard, reviewed mail. Met with employee retrieving personal items. Searched files in the accounting office, etc.	4.50 190.00/hr	855.00
11/12/2015 AJ	Project Management Confer with Tom re entity records requested by AUSA. Advise re volume, and direct to the matrix for a list. Recevie direction to have	0.50 190.00/hr	95.00

Thomas Seaman, I	Receiver for Chen	Р	age 16
		Hrs/Rate	Amount
	documents copied to CD. Confer with Matt re same and provide details re scope.		
11/12/2015 AJ	Project Management Review email from Ted re meet and confer with Zaccaro. Work on getting details gathered for response and complaint against ALLY.	3.50 190.00/hr	665.00
AJ	Project Management Review email from Darren re paystubs for hotel. Send link for same.	0.20 190.00/hr	38.00
11/13/2015 AJ	Project Management Work on gathering details for report, and for Ally response.	1.70 190.00/hr	323.00
AJ	Project Management Provided property info to Tim re Alhambra appt. Need to contact Chase to make payment on loan, etc.	0.20 190.00/hr	38.00
AJ	Project Management Work with Tom on Ally investors data. Calls with Ted, Tom and David. Review and confer with Tom re Report, etc.	3.00 190.00/hr	570.00
11/16/2015 AJ	Project Management Review property lists, tenant files, etc. Confer with Tom and Tim re site visits.	0.70 190.00/hr	133.00
AJ	Project Management Review email from Wayne Zhao's attorney. Advise Tom re same.	0.10 190.00/hr	19.00
AJ	Project Management Review email from Ted re source of Bird Marella retainer. Begin to research entity in bank records, etc.	1.30 190.00/hr	247.00
AJ	Project Management Email from Tim re check received from bank, and response from another bank re no funds in accounts.	0.20 190.00/hr	38.00
AJ	Project Management Review bank lists, turnover request letters, etc. Review responses received and work list of non-responsive banks.	1.40 190.00/hr	266.00
11/17/2015 AJ	Project Management Review email from Ted with detail on retainer wires from Singapore entity. Look up and print info on entity. Confer with Tom re same.	1.30 190.00/hr	247.00
AJ	Project Management Confer with Tom re status on digital forensic images, additional work needed to gather data and other items. Emails with David Jimenez and Tom re same. Send email to David and team with known company email addresses with passwords. Request they preserve and run searches for others. Work with Tom on email of details on	1.80 190.00/hr	342.00

### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 68 of 113 Page ID #:2042

Thomas Seaman, F	Receiver for Chen	Pa	age 17
	-	Hrs/Rate	Amount
	next steps for David and BRG.		
11/17/2015 AJ	Project Management Call with Ted and Tom re requesting assistance of former employee through her counsel. Email re same.	0.20 190.00/hr	38.00
AJ	Project Management Scan and email letter from Chen's attorney to Tim and Ted. Reviewed response from Tim.	0.20 190.00/hr	38.00
AJ	Project Management Received payroll report from Darren. Review and sent to accountant for processing.	0.50 190.00/hr	95.00
11/18/2015 AJ	Project Management Email from Tim re check received. Inquired re which entity funds belonged to. Follow up calls and emails re same.	0.20 190.00/hr	38.00
AJ	Project Management Received draft payroll for hotel. Review and send approval to accountant to run. Email Darren, Kristin, and Matt re same. Work on Hills Garden review, taxes, payroll, insurance, etc.	1.40 190.00/hr	266.00
LA	Project Management Confer with Darren re workers comp insurance. Calls and emails re same. Emails with accountant re reports needed, etc.	0.40 190.00/hr	76.00
AJ	Project Management Text Tom to advise that report still not posted to website and email not sent.	0.10 190.00/hr	19.00
AJ	Project Management Confer with Darren re electricity at golf course. Confer re new service, deposit amount, etc. Call with Darren re check for payment.	0.30 190.00/hr	57.00
11/19/2015 AJ	Project Management Review two boxes of mail brought from Arcadia site, and mail forwarded to Irvine. Begin to sort and prioritize. Provide direction to Matthew same.	2.20 190.00/hr	418.00
AJ	Project Management Review payroll reports received for workers comp and forward to Darren,	0.20 190.00/hr	38.00
11/20/2015 AJ	Project Management Email from Ted inquiring about response from Lui or attorney. Confer with Tom re same and reply to Ted.	0.20 190.00/hr	38.00

Thomas Seaman, F	Receiver for Chen		Page 18
		Hrs/Rate	Amount
11/20/2015 AJ	Project Management Review records from BofA Ally subpoena. Scan and email to counsel.	1.00 190.00/hr	190.00
AJ	Project Management Confer with Tom re car in impound, will have Darren resolve. Locate records and forward to Darren. Confer with Darren re notice from Chen's attorney re car in impound etc	0.50 190.00/hr	95.00
AJ	Project Management Emails with counsel re Zhao and send info on address, etc.	0.30 190.00/hr	57.00
11/24/2015 AJ	Project Management Calls with Tom re Ally attorney filing. Discuss response, details of entities to search for, deadlines, etc.	0.60 190.00/hr	114.00
11/25/2015 AJ	Project Management Email from accountant for Chen re hotel payroll deadline.	0.10 190.00/hr	19.00
AJ	Project Management Received email from Tim Hsu with info on certain Chinese entities, review records. Forward email to David Jimenez and request that he include additional names in search query.	1.10 190.00/hr	209.00
AJ	Project Management Received email from Ted with Rough draft of Toms declaration for Ally response. Review and mark up same.	1.50 190.00/hr	285.00
11/29/2015 AJ	Project Management Review emails from David and Tom re search findings and issues with opening files.	0.20 190.00/hr	38.00
11/30/2015 AJ	Project Management Call with Tom re search results, and filing deadline, etc	0.20 190.00/hr	38.00
AJ	Project Management Call with Tim at Allen Matkins re file from BofA Received and reviewed file from Tim with additional Ally records. Confer with TOm re same.	1.20 190.00/hr	228.00
AJ	Project Management Work on response to Ally with Tom. Provide info, look up and research response. Calls with David, and Ted re same. Review revisions of Dec. until final.	3.40 190.00/hi	646.00
11/3/2015 DC	Project Management Located and FedEx certified copies of Preliminary Injunction and Order to Tom Seaman in New York including info on possible USFIA office in New York.	0.20 160.00/hi	32.00

# Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 70 of 113 Page ID #:2044

Thomas Seaman, F	Receiver for Chen	Pa	age 19
	<u>-</u>	Hrs/Rate	Amount
11/4/2015 DC	Project Management  Dealt with workers comp question on multiple entities. Emailed paperwork to broker and to rep at State Fund; read and responded to multiple emails which necessitated additional conference calls. Sent preliminary injunction to State Fund.	0.90 160.00/hr	144.00
DC	Project Management Emailed Winston Lao to cancel 3 of 4 existing work comp policies 9128456 - USFIA, Inc. 9077019 Apollo Real Estate Investment	0.30 160.00/hr	48.00
11/10/2015 DC	Project Management Online meeting with Insurance Broker regarding online certificate issuance for various entities.	1.00 160.00/hr	160.00
11/16/2015 DC	Project Management Confirmed online insurance demo with Allrisks.	0.10 160.00/hr	16.00
11/19/2015 DC	Project Management Met with Tom Seaman regarding internet contract issues at hotel.	0.10 160.00/hr	16.00
DC	Project Management Met with receiver regarding workers comp issues at hotel.	0.10 160.00/hr	16.00
11/20/2015 DC	Project Management Received instruction and paperwork from Alison Juroe regarding potential USFIA vehicles. Performed research on ownership. Contacted tow yard to discuss and responded to David Zaro and Tom Seaman.	0.70 160.00/hr	112.00
DC	Project Management Updated Tom Seaman regarding internet situation at hotel.	0.10 160.00/hr	16.00
11/21/2015 DC	Project Management Further research regarding vehicles. Ran KSRs and looked through all mail on hand looking for any bills etc	0.80 160.00/hr	128.00
DC	Project Management Organized additional paperwork for hotel and golf course. Scanned and saved to receivers master digital files.	0.70 160.00/hr	112.00
11/24/2015 DC	Project Management Conducted entity research.	0.40 160.00/hr	64.00
DC	Project Management Took call from Receiver requesting a phone number for former USFIA employee located on one of the initial interview forms. Located form and number, verified with hotel and relayed information to Receiver.	0.30 160.00/hr	48.00

### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 71 of 113 Page ID #:2045

Thomas Seaman, F	Receiver for Chen		P	age	20
		<u>Hr</u>	s/Rate	Amo	<u>ount</u>
11/11/2015 TM	Project Management Downloaded new PACER documents for the case.	,	0.10 165.00/hr	16	3.50
11/23/2015 <b>TM</b>	Project Management Downloaded PACER documents.	,	0.20 165.00/hr	33	3.00
SUBT	ΓΟΤΑL:	[	56.10	10,480	—— ).50]
Prope	erty Management				
11/3/2015 DC	Property Management Researched coin-op laundry services and sent links to Tim McDonnell; reviewed laundrey revenu income from other apartment complexes under management and relayed info to Tim McDonnell.		0.40 160.00/hr	64	4.00
11/9/2015 DC	Property Management Reviewed, scanned and filed weekly report from golf course care taker; reviewed photos.		0.40 160.00/hr	6	4.00
11/11/2015 DC	Property Management Had call with caretaker of Quail Hills Golf course regarding activity for week.		0.30 160.00/hr	4	8.00
11/13/2015 DC	Property Management Had conference call with caretaker of golf course.		0.20 160.00/hr	3:	2.00
11/16/2015 DC	Property Management Had call with golf course caretaker and reviewed weekly report.		0.30 160.00/hr	4	8.00
11/18/2015 DC	Property Management Received urgent call from golf course caretaker regarding power outage. Investigated issue and made multiple calls to determine no power outage. Service cut due to non-payment. Contacted receiver, Edison account manager and accountant to discuss payment prior to cutoff time of 7:00 PM. Established new account and made ACH payment with approval from Receiver and notified caretaker.		1.40 160.00/hr	22	4.00
11/19/2015 DC	Property Management  Dealt with additional power issues related to golf course.		0.30 160.00/hr	4	8.00
DC	Property Management Had call with golf course caretaker regarding cell tower leases; obtained contact information.		0.20 160.00/hr	3	2.00
DC	Property Management Researched contracts and payment history for cell tower leases.		0.60 160.00/hr	9	6.00

### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 72 of 113 Page ID #:2046

Thomas Seaman, F	Receiver for Chen	F	age 21
		Hrs/Rate	Amount
11/20/2015 DC	Property Management Responded to text from golf course caretaker.	0.10 160.00/hr	16.00
11/23/2015 DC	Property Management Had phone call with caretaker of golf course to discuss past week report.	0.30 160.00/hr	48.00
DC	Property Management Confirmed wire for payroll for caretaker at golf course.	0.10 160.00/hr	16.00
11/30/2015 DC	Property Management Reviewed weekly report from caretaker at golf course and scanned to file and reviewed photos.	0.30 160.00/hr	48.00
11/2/2015 TM	Property Management Call from Unit D resident re broken faucet. Call to handyman re same. Call from Handyman re item fixed. Call to resident at Unit D to confirm all work done.	0.40 165.00/hr	66.00
ТМ	Property Management Received roof replacement bid. Reviewed and email to contractor with question re language in bid.	0.20 165.00/hr	33.00
TM	Property Management Gathered items to take to Alhambra.	0.10 165.00/hr	16.50
11/3/2015 TM	Property Management Travel time to Alhambra Gardens, Alhambra Utilities, and back to office; at half pay.	1.30 165.00/hr	214.50
ТМ	Property Management Met with apartment manager and handyman to hand out check for past work, approve new work, check on work performed, gather rents. Determined storage room needs to have rents forwarded to office, discussed with handyman re same. Took notes of items needed re laundry facility, faucet work, extermination, etc.	1.00 165.00/hr	165.00
TM	Property Management Turned in utilities paperwork and payment at Alhambra Utilities.	0.20 165.00/hr	33.00
ТМ	Property Management Approved invoice for payment of work previously billed, but check was canceled during turnover. Made scan and provided info on invoice.	0.20 165.00/hr	33.00
TM	Property Management Entered statement charges for rents received. Reviewed leases for missing documents. Made copies of payments and turned in rents.	2.00 165.00/hr	330.00

Thomas Seaman, I	Receiver for Chen	Pa	age 22
		Hrs/Rate	Amount
11/3/2015 T <b>M</b>	Property Management Call from tenant re roof leak. Calls to two roofers re getting bids.	0.30 165.00/hr	49.50
11/4/2015 TM	Property Management Email from Alhambra utilities with trash application card to sign. Edited, signed and sent back.	0.30 165.00/hr	49.50
ТМ	Property Management Discussed laundry possibilities and security cameras with Darren. Discussed probable revenue stream for laundry based off other similar sized apartments.	0.10 165.00/hr	16.50
ТМ	Property Management Calls to roofers re need for estimate.	0.10 165.00/hr	16.50
ТМ	Property Management Call to SCE to lower deposit for Arcadia and Alhambra addresses. Approved deposit for payment. Attempted to get previous bills sent, deposits sent to Receiver. Letter to SCE re authorization to communicate with the Receiver. Sent from post office.	1.20 165.00/hr	198.00
ТМ	Property Management Call from Republic re trash service at Arcadia, discussed and confirmed moving to once a week service. Told I would receive info in email and asked to sign and send back to her.	0.10 165.00/hr	16.50
11/5/2015 <b>TM</b>	Property Management Email from Republic, reviewed numbers on service agreement, filled out, signed, scanned and sent back.	0.30 165.00/hr	49.50
11/9/2015 TM	Property Management Direction from Tom re insurance on properties, need for 3-day notice, letters of termination, tenant letters, utilities and landscaping, etc. Gathered leases from Alison.	1.00 165.00/hr	165.00
Τ <b>M</b>	Property Management Calls to insurance agencies to determine which policies are in force and which were not. Reported back. Sent direction to Travelers and agent re billing address changes. Requested agent search for other properties of owners. Downloaded reports re properties in anticipation of questions from insurance agent. Downloaded grant and property profiles.	2.00 165.00/hr	330.00
TM	Property Management Search for exterminator vender close to apartments. Called, put on hold, left message and searched for others.	0.50 165.00/hr	82.50
TM	Property Management Call from exterminator and gathered contact info. Set up initial site visit for inspection.	0.10 165.00/hr	16.50

Thomas Seaman, I	Receiver for Chen	Pa	age 23
		Hrs/Rate _	Amount
11/10/2015 <b>TM</b>	Property Management Scanned insurance docs for 135 E Live Oak Ave, Arcadia, CA 91006.	0.10 165.00/hr	16.50
TM	Property Management Call to tenant re having the exterminator visit unit for inspection. Sent email with translation. Searched lease info for phone number to tenant, updated spreadsheet of tenants.	0.70 165.00/hr	115.50
ТМ	Property Management Gathered property info for 4116 Lynd Ave, Arcadia, CA 91006. Asked Alison of name of tenant, if any, to relay to insurance companies for proposals.	0.10 165.00/hr	16.50
ТМ	Property Management Received roof proposal and read info on asphalt roofing materials to be used.	0.50 165.00/hr	82.50
ТМ	Property Management Approved invoice for security service.	0.10 165.00/hr	16.50
TM	Property Management Downloaded profile reports of all Riverside Ahome properties and put in subfolder. Added info to insurance proposal request.	1.10 165.00/hr	181.50
TM	Property Management Searched for laundry vender. Took down contact info and put in phone.	0.50 165.00/hr	82.50
ŤΜ	Property Management Call from tenant in Apt. SS re 3 repair requests. Call to handyman re same and arranged for a site visit.	0.50 165.00/hr	82.50
11/11/2015 TM	Property Management Downloaded property profile, overhead pictures, and Zillow information for 345 Oak Mountain Rd, Bradbury, CA 91008 for insurance purposes.	0.40 165.00/hr	66.00
TM	Property Management Downloaded property profile, overhead pictures, and Zillow information for 849 Balboa Dr, Arcadia, CA 91007-6402. Prepared for insurance proposal request.	0.30 165.00/hr	49.50
ТМ	Property Management Received confirmation of insurance for 135 E. Live Oak.	0.10 165.00/hr	16.50

Thomas Seam	nan, F	Receiver for Chen	ŀ	Page 24
			Hrs/Rate	Amount
11/11/2015 T	ГМ	Property Management Text to Alison re insurance needs.	0.10 165.00/hr	16.50
Т	ГΜ	Property Management Text from Alison re inspection of unit by Housing Authority. Text to manager re same and he met with tenant re same.	0.20 165.00/hr	33.00
T	ТМ	Property Management Texts to tenant re appointment for exterminator. Call to manager, call to exterminator to give contact info.	0.50 165.00/hr	82.50
Т	TM	Property Management Call to Whitfield and left message, reviewed bid.	0,30 165.00/hr	49.50
Т	TM	Property Management Review of sealants and coatings on internet re roof bid.	0,40 165,00/hr	66.00
T	TM	Property Management Downloaded pictures from phone re roof, laundry, etc.	0.20 165.00/hr	33.00
Γ	ТМ	Property Management Call to laundry services and discussed options. Received email re same, called back re location and questions.	0.40 165.00/hr	66.00
11/12/2015 ]	тM	Property Management Received 3rd roof estimate and printed, reviewed, call to contractor re questions or timing, additional costs.	0.40 165.00/hr	66.00
1	TM	Property Management Call to Landfried re security services.	0.10 165.00/hr	16.50
٦	TM	Property Management Received info re extermination services, replied re items to be done.	0.10 165.00/hr	16.50
11/13/2015	TM	Property Management Review of extermination work. Call to exterminator re need for help with Chinese speaking tenant and need for proper bags.	0.30 165.00/hr	49.50
-	тм	Property Management Call to Whitfield re roof estimate and discussed costs, preparation work needed, ability to remove old roof materials, timeline to complete either smaller repairs or whole roof. Discussed potential costs of the underside of roof materials if wood damaged. Summarized other offers, prepared pictures, discussed with Tom. Approved, scan to Whitfield re same.	1.10 165.00/hr	181.50
-	TM	Property Management Call and email to Landfried re minor change of request. Discussed motion sensor issues, mail, people who come to the site, issues with	0.60 165.00/hr	99.00

Thomas Seaman, I	Receiver for Chen	. Р	age 25
		Hrs/Rate	Amount
	electricity, etc.		
11/13/2015 TM	Property Management Call from laundry service re proposal.	0.30 165.00/hr	49.50
TM	Property Management Discussed statement charges with Matthew.	0.20 165.00/hr	33.00
TM	Property Management Alison direction on Chase mortgage.	0.10 165.00/hr	16.50
ТМ	Property Management Items regarding property from Alison. Direction re mortgage re Alhambra Gardens.	0.10 165.00/hr	16.50
11/15/2015 TM	Property Management Call from tenant re roof repair.	0.10 165.00/hr	16.50
ТМ	Property Management Review of tenant leases to determine any missing documents, correct rent amounts, utility info, names, etc.	2.00 165.00/hr	330.00
11/16/2015 TM	Property Management Call to exterminator to set up appointment and to get Chinese translation, if possible. On hold, having Chinese department records searched for correct documents to send to tenants.	0.30 165.00/hr	49.50
ТМ	Property Management Call to and from Whitfield re getting starter check for roof repair. Approved invoice and gave to Kristen for payment and mailing instructions.	0.20 165.00/hr	33.00
ТМ	Property Management Gathered housing authority contact info of all Section 8 tenants. Call to Housing Authority, difficulty finding case workers as both no longer worked there. Gathered info for owner assistance group and told to call back later after lunch.	0.40 165.00/hr	66.00
TM	Property Management Sent translation of apartment preparation instructions to residents in chinese. Used Google Translate for email. Received email back to proceed with exterminator appointment. Calls to exterminator and left a message.	0.30 165.00/hr	49.50
TM	Property Management Direction to handyman re range hood replacements in two units. Call from same.	0.20 165.00/hr	33.00

Thomas Sear	man, F	Receiver for Chen	P	age 26
			Hrs/Rate	Amount
11/16/2015	TM	Property Management Call to exterminator. LM.	0.10 165.00/hr	16.50
	ТМ	Property Management Review of leases for Housing Authority info, missing documents.	1.20 165.00/hr	198.00
	TM	Property Management Approved invoice for starter check for roof repairs. Got check, cover letter, took to post office for mailing. Direction to contractor re sign issue.	0.30 165.00/hr	49.50
	TM	Property Management Call from pest control and arranged time.	0.10 165.00/hr	16.50
	TM	Property Management Call from Landfried and discussed proposal he sent. Reviewed re items needed.	0.40 165.00/hr	66.00
11/17/2015	TM	Property Management Email from tenant re pest control, translated, replied with appointment time.	0.30 165.00/hr	49.50
	ТМ	Property Management Further review of security proposal and put on spreadsheet. Presented to Tom.	1.00 165.00/hr	165.00
	TM	Property Management Discussion with Tom re laundry service.	0.10 165.00/hr	16.50
	TM	Property Management Called several times to Housing Authority and left message re owner services. Received callback and discussed turnover. Sent detailed instructions with Order Appointing and wiring instructions.	0.70 165.00/hr	115.50
	ТМ	Property Management Made scans of leases. Call to Huron re same.	0.30 165.00/hr	49.50
	TM	Property Management Email from Housing Authority.	0.10 165.00/hr	16.50
11/18/2015	TM	Property Management Call from Housing Authority re transfer. Discussed bank account, previous payments, freeze on payment until all paperwork finished.	0.10 165.00/hr	16.50
	TM	Property Management Email to Huron re names of tenants in property. Named scans of leases, sent to Huron.	0.60 165.00/hr	99.00
	TM	Property Management Call from roofer re delivery of materials. Discussed material delivery, removal of waste, access to building, timetable for completion. Text to	0.30 165.00/hr	49.50

## Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 78 of 113 Page ID #:2052

Thomas Seaman, F	Receiver for Chen	P	age 27
		Hrs/Rate	<u>Amount</u>
	apartment manager re same.		
11/19/2015 T <b>M</b>	Property Management Email to Housing Authority re contracts.	0.10 165.00/hr	16.50
ТМ	Property Management Gathered item from Housing Authority to call B of A re accounts.	0.10 165.00/hr	16.50
TM	Property Management Collected laundry room monies, checked on units requiring exterminator inspection, talked with tenant re needed repairs to floor due to water damage. Turned in monies to Matthew. Discussed rent payments that came in and items on spreadsheet with Matthew.	1.20 165.00/hr	198.00
TM	Property Management Call to exterminator to set up appointment for 5 units. Call with Whitfield re roof repair start. Text to apartment manager re same.	0.30 165.00/hr	49.50
11/20/2015 TM	Property Management Email to Whitfield with W-9 for fill out.	0.10 165.00/hr	16.50
ТМ	Property Management Text to apartment manager re pest inspections.	0.10 165.00/hr	16.50
TM	Property Management Text to handyman and manager re need to look at Unit P flooring.	0.10 165.00/hr	16.50
TM	Property Management Review of leases to determine owner responsibility for utilities, HOA, etc.	0.30 165.00/hr	49.50
11/23/2015 TM	Property Management Received W-9 for contractor and gave to Kristen. Saved in pubdocs.	0.10 165.00/hr	16.50
ТМ	Property Management Made 30-day notice and other materials.	0.40 165.00/hr	66.00
ТМ	Property Management Calls to and from tenant re repairs. Call and text to handyman re finishing items tomorrow.	0.20 165.00/hr	33.00
11/24/2015 TM	Property Management Approved utility bills and added new metering info to spreadsheets for tracking.	1.00 165.00/hr	165.00
ТМ	Property Management Tax items for Alhambra, Live Oak, Upland, Moreno Valley, etc. Found other properties and emails to Tom.	2.70 165.00/hr	445.50

## Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 79 of 113 Page ID #:2053

Thomas Sear	man, F	Receiver for Chen		Page 28
			Hrs/Rate	Amount
11/24/2015	TM	Property Management Dealt with inspection issues re Alhambra Gardens. Scans of documents, calls to manager re same.	0.30 165.00/h	49.5 <b>0</b> r
	TM	Property Management Made 30-day notice and sent to attorney for service re 919 Fairview.	0.70 165.00/h	115.50 r
11/30/2015	TM	Property Management Sent approval to exterminator. Call from exterminator re issues at AGA. Approved continuation. Notification of tenants re same.	0.50 165.00/h	82.50 r
	TM	Property Management Call from Whitfield re completion of roof repair at AGA.	0.10 165.00/h	16.50 ir
	TM	Property Management Call from prospective tenant seeking info re vacancies.	0.10 165.00/h	16.50 ir
	SUBT	OTAL:	[ 43.60	7,169.50]
	Recei	ver		
11/2/2015	TAS	Receiver Research Newsparkle invoice, large payments, have attorney do subpoena	0.60 375.00/h	225.00 nr
	TAS	Receiver Review Deodar property information, suggest lis pendens	0.30 375.00/h	112.50 nr
	TAS	Receiver Assemble information for Flushing site visit	0.30 375.00/h	112.50 nr
	TAS	Receiver Telephone call with counsel re Ally, BofA, Amkey Global, other	0.50 375.00/h	187.50 nr
	TAS	Receiver Confer with Alison re subpoena productions	0.20 375.00/f	75.00 nr
	TAS	Receiver Confer with Alison re W. Liu	0.20 375.00/h	75.00 nr
11/5/2015	TAS	Receiver Go to Flushing location post orders	1.20 375.00/h	450.00 nr
	TAS	Receiver Confer with Alison re Ally bank records, payments from Ahome, missing periods and items, payments form China, next steps; Telephone call with counsel re same	0.60 375.00/i	225.00 nr

## Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 80 of 113 Page ID #:2054

Thomas Seaman, F	Receiver for Chen	Pa	age 29
		Hrs/Rate	Amount
11/5/2015 TAS	Receiver Telephone call with Ted Fates re Zaccaro, Ally, etc	0.40 375.00/hr	150.00
11/6/2015 TAS	Receiver Telephone call with ATM vendor re findings	0.30 375.00/hr	112.50
TAS	Receiver Telephone call with Alison re banking records, subpoena production, etc	0.40 375.00/hr	150.00
11/8/2015 TAS	Receiver Work on narrative for first report	2.70 375.00/hr	1,012.50
11/9/2015 TAS	Receiver Work on first report, Telephone call with Ted re same	2.30 375.00/hr	862.50
TAS	Receiver Meet with Tim and Alison re real estate, insurance and direction re same	0.60 375.00/hr	225.00
TAS	Receiver Meet with Alison re staffing, information for report, banking records, other	0.60 375.00/hr	225.00
11/11/2015 TAS	Receiver Review preliminary Hills Garden financials, confer re improving and consider options, changes to Chart of Accounts and method for accounting	0.70 375.00/hr	262.50
11/12/2015 TAS	Receiver Analyze Ally bank account deposits and withdrawals, sources of funds, Telephone call with Ted Fates re same in advance of and during meeting, confer afterward	2.30 375.00/hr	862.50
TAS	Receiver Finish narrative for report, add information, etc	2.10 375.00/hr	787.50
TAS	Receiver Telephone call with ATM vendor re findings, Telephone call with Richard R. re same	0.50 375.00/hr	187.50
TAS	Receiver Confer wiht subpoena production	0.40 375.00/hr	150.00
11/13/2015 TAS	Receiver Review more evidence with Alison re Ally, Chen, Zhwo	0.60 375.00/hr	225.00
TAS	Receiver Telephone call with Ted Fates and alter David, and Alison re Ally, Zahoe, Chen report, need to add Ally as subsidiary and affiliate	1.30 375.00/hr	487.50

## Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 81 of 113 Page ID #:2055

Thomas Seaman, F	Receiver for Chen	Pa	age 30
		Hrs/Rate	Amount
11/13/2015 TAS	Receiver Review latest draft of report, confer with Ted re same, revises, etc	0.40 375.00/hr	150.00
TAS	Receiver Confer with Tim re roofing issues at apartment building	0.10 375.00/hr	37.50
11/16/2015 TAS	Receiver Confer re pending IT and digital information issues, email re same	0.70 375.00/hr	262.50
TAS	Receiver Emails with AUSA re subpoena production	0.50 375.00/hr	187.50
TAS	Receiver Calls with former employee re assistance	0.40 375.00/hr	150.00
11/17/2015 TAS	Receiver Telephone call with Wally re Mo Chen's visit to Arcadia office	0.30 375.00/hr	112.50
TAS	Receiver Email unlawful detainer counsel re evictions, direct Tim re same	0.20 375.00/hr	75.00
TAS	Receiver Emails re former employee, solicit to return to help	0.30 375.00/hr	112.50
TAS	Receiver Emails re evidence log re computer back-ups	0.50 375.00/hr	187.50
TAS	Receiver Emails re unlocking password protected excel file	0.30 375.00/hr	112.50
11/18/2015 TAS	Receiver Travel to SB Police Department, City Hall and hotel	1.30 375.00/hr	487.50
TAS	Receiver Meet at police department for live scan finger prints	0.80 375.00/hr	300.00
TAS	Receiver Confer with Darren re workers compensation insurance at hotel	0.20 375.00/hr	75.00
TAS	Receiver Direct Tim re website	0.10 375.00/hr	37.50
11/19/2015 TAS	Receiver Meet at City Hall re business license, zoning review, background check, complete various applications and forms and documents	2.40 375.00/hr	900.00

# Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 82 of 113 Page ID #:2056

Thomas Seaman, F	Receiver for Chen	Pa	age 31
		Hrs/Rate	Amount
11/19/2015 TAS	Receiver Tour hotel	0.70 375.00/hr	262.50
TAS	Receiver Confer with Tim re single family home site visits	0.30 375.00/hr	112.50
TAS	Receiver Confer with Darren re internet contract at hotel	0.10 375.00/hr	37.50
11/20/2015 TAS	Receiver Give direction re impounded vehicle	0.10 375.00/hr	37.50
11/23/2015 TAS	Receiver Telephone call with SEC re Alliance Financial Group, Inc. research formation documents, direct Tim re completing, review retrieved documents, direct Tim to revise website, Telephone call with SEC re same, also re posting more filings, etc	0.70 375.00/hr	262.50
TAS	Receiver Telephone call with Ted Fates re frozen accounts	0.30 375.00/hr	112.50
TAS	Receiver Telephone call with counsel re Li Zhao, Ally, USFIA Singapore	0.40 375.00/hr	150.00
11/24/2015 TAS	Receiver Review Li Zhao motion re intervention and unfreezing of funds, Telephone call with Ted Fates re response objecting to same	0.60 375.00/hr	225.00
TAS	Receiver Retrieve frozen safety deposit box information	0.10 375.00/hr	37.50
TAS	Receiver Travel time at 50% of time to Arcadia	0.60 375.00/hr	225.00
TAS	Receiver Work at site, meetings re digital records, IT system, data, searches, review mail, books and records	2.40 375.00/hr	900.00
TAS	Receiver Go to Cloverly and inspect contents, vitamins, marketing materials storage, records, etc	1.20 375.00/hr	450.00
TAS	Receiver Go to Bank of America re safety deposit box, make arrangements for future access	0.70 375.00/hr	262.50

Thomas Sean	nan, R	eceiver for Chen		Р	age 32
			<u> </u>	Irs/Rate	Amount
11/24/2015	TAS	Receiver Travel time at 50% of time to Arcadia, Cloverly, Bof A		0.30 375.00/hr	112.50
	TAS	Receiver Travel time at 50% of time back to Irvine		1.20 375.00/hr	450.00
11/25/2015	TAS	Receiver Read Zhao's motion to intervene and declarations, consider same, Telephone call with counsel re same and itminng, reply, etc		1.80 375.00/hr	675.00
	TAS	Receiver Confer with Matthew re property taxes and real estate assets		0.30 375.00/hr	112.50
11/27/2015	TAS	Receiver Review accounting records re Zhao response		1.40 375.00/hr	525.00
	TAS	Receiver Emails and calls re digital file searches		0.60 375.00/hr	225.00
11/29/2015	TAS	Receiver Read and consider draft declaration, Telephone call with David re additional concepts		1.10 375.00/hr	412.50
	TAS	Receiver Review extracted digital data		2.10 375.00/hr	787.50
11/30/2015	TAS	Receiver Review flattened files, print select documents		1.30 375.00/hr	487.50
	TAS	Receiver Review Ally bank records, clean up and summarize analysis, analyze account statements received today, prepare narrative calls with counsel re same,		7.10 375.00/hr	2,662.50
	TAS	Receiver Telephone call with David re need to call buyer's counsel		0.20 375.00/hr	75.00
	TAS	Receiver Arrangements with Bank re safety deposit box		0.10 375.00/hr	37.50
	TAS	Receiver Telephone call with Ted Fates re need to get list of creditors on file, evidence etc		0.30 375.00/hr	112.50
	SUBT	OTAL:	[	53.60	20,100.00]
	Recei	vership Administration			
11/12/2015	MRF	Receivership Administration Received directions from Alison Juroe re having entity documents		0.80 75.00/hr	60.00

Thomas Seaman, F	Receiver for Chen	Р	age 33
		Hrs/Rate	Amount
	scanned and uploaded to a disk. Contacted vendor for completion of project. Reviewed documents being sent to scanning and pulled unnecessary files.		
11/13/2015 MRF	Receivership Administration Spoke with vendor re completion of document scanning and receipt of final results. Communicated with additional vendor re deposit slips order.	0.20 75.00/hr	15.00
11/16/2015 <b>M</b> RF	Receivership Administration  Downloaded digital copy of entity documents scanned by vendor and stored files.	0.30 75.00/hr	22.50
11/17/2015 MRF	Receivership Administration Prepared package and sent documents turned over to counsel.	0.20 75.00/hr	15.00
11/19/2015 MRF	Receivership Administration Received instructions from Alison Juroe re sorting mail taken from Live Oak offices and creating a creditor list for vendors with outstanding balances. Pulled/sorted mail/statements received.	0.90 75.00/hr	67.50
11/20/2015 <b>M</b> RF	Receivership Administration Reviewed mail from Live Oak offices, opened/sorted statements, and received additional instructions re responding to same.	1.60 75.00/hr	120.00
11/25/2015 MRF	Receivership Administration Received property tax bills, notices, and statements from Tim McDonnell to look in to. Reviewed and scanned documents to files for potential receivership assets.	0.60 75.00/hr	45.00
MRF	Receivership Administration Discussed notices and property tax bills with Thomas Seaman and received instructions for forwarding/filing. Received instructions on separating documents found on-site from those researched in-house and completed.	0.80 75.00/hr	60,00
11/30/2015 MRF	Receivership Administration Printed and sorted documents for Thomas Seaman relating to Hong Kong entities and Ally Investors. Created spreadsheet and input tenant/lease information for properties purchased by the receivership entities.	1.90 75.00/hr	142.50
MRF	Receivership Administration Scanned in documents re potential receivership assets. Forwarded mail to new addresses for Live Oak tenants and filed property tax bills.	0.70 75.00/hr	52.50
SUB <sup>-</sup>	TOTAL:	[ 8.00	600.00]

## Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 85 of 113 Page ID #:2059

Thomas Seaman, F	Receiver for Chen	I	Page 34
		Hrs/Rate	Amount
Resea	arch files		
11/2/2015 AJ	Research files Travel time at 50% of time to and from Arcadia office.	0.70 190.00/hr	133.00
AJ	Research files Onsite at Arcadia office to review records, computers, etc.	9.00 190.00/hr	1,710.00
11/3/2015 AJ	Research files Travel time at 50% of time to and from the Arcadia office.	1.30 190.00/hr	247.00
AJ	Research files Onsite at the Arcadia office to review records, files, computers, mail, etc.	9.20 190.00/hr	1,748.00
11/5/2015 AJ	Research files Review records and research findings, etc. Review records received from BOFA.	2.30 190.00/hr	437.00
11/9/2015 AJ	Research files Continue to review files, banking records, search online for missing details on entities, etc. Updates to matrix, etc.	2.80 190.00/hr	532.00
11/10/2015 AJ	Research files Review banking records, search quickbooks files, print reports and lists, etc. Search for real properties purchased by receivership entities or with their funds.	3.20 190.00/hr	608.00
11/17/2015 AJ	Research files Continue to review banking files and other documents from the Arcadia office.	2.20 190.00/hr	418.00
11/25/2015 AJ	Research files Research and gather docs and info need to respond to Ally motion.	2.50 190.00/hr	475.00
11/5/2015 <b>M</b> RF	Research files Received information re additional properties owned by Chen and added to the tracking list.	0.30 75.00/hr	22.50
11/11/2015 <b>M</b> RF	Research files Received additional entity documents from Alison Juroe and updated the entity info in the master tracking matrix. Researched additional entities online to locate their EIN's and additional filing information.	1.90 75.00/hr	142.50
11/30/2015 MRF	Research files Reviewed and sorted bank/merchant account statements received at Live Oak address.	2.00 75.00/hr	150.00
SUBT	FOTAL:	[ 37.40	6,623.00]

## Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 86 of 113 Page ID #:2060

Thomas Sea	man, R	eceiver for Chen		Page	35
			Hrs/Rate	Am	ount
	Sell Pr	roperty/Liquidate Assets			
11/18/2015	AJ	Sell Property/Liquidate Assets Forward email to Tom re party interested in purchasing apt building.	0.10 190.00/h		9.00
	SUBT	OTAL:	[ 0.10	1	9.00]
	<u>Takeo</u>	ver Property			
11/4/2015	AJ	Takeover Property Call with Tom re New York office. Research and prepare email to Tom with info on landlord, tenant (USFIA employee), etc.	0.70 190.00/h		3.00
11/2/2015	TM	Takeover Property Call from Alison re property in Bradbury. Logged onto Chicago Title web site and downloaded property profile and 9 grant deeds and trust deeds, labeled. Emailed all to Alison with text confirm.	0.80 165.00/r		32.00
	TM	Takeover Property Direction from Tom to find info re property in New York. Extensive research on potential tenants at property. Made map of route from airport. Looked up property tax assessment of property to determine ownership.	3.70 165.00/h		0.50
11/3/2015	TM	Takeover Property Got certified copy of Preliminary Injunction to send to Tom. Ordered more from attorneys.	0.30 165.00/h		19.50
	TM	Takeover Property Email from Alison re previous property.	0.10 165.00/h		16.50
11/4/2015	TM	Takeover Property Text and call from Tom re need for password.	0.10 165.00/h		16.50
	ΤM	Takeover Property Letter to First Citizens Bank re turnover request. Sent by fax and USPS. Made pdf of sent items. Made pdf of First Citizens' letter to Receiever.	0.60 165.00/h		99.00
11/5/2015	TM	Takeover Property Letter to Intuit.	0.40 165.00/l		66.00
11/6/2015	TM	Takeover Property Letter to Intuit. Edits, combined with the PI and sent. Entered contact info of Intuit personnel.	0.20 165.00/l		33.00
11/9/2015	TM	Takeover Property Questions re turnover amounts, printed spreadsheet with turnover amounts for Tom's report.	0.10 165.00/l		16.50

## Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 87 of 113 Page ID #:2061

Thomas Seaman, Receiver for Chen		Pa	age 36
		<u>Hrs/Rate</u>	Amount
11/12/2015 TM	Takeover Property Searched for more parcels in Riverside County.	0.70 165.00/hr	115.50
ТМ	Takeover Property Sent revised letters to banks re new affiliates.	5.60 165.00/hr	924.00
11/13/2015 TM	Takeover Property Finished sending bank freeze letter, call to Far East National re getting legal order processing address. Sent by email and USPS. Received reply from National Bank of California. Dropped off at two banks.	2.00 165.00/hr	330.00
11/16/2015 TM	Takeover Property Email from bank re check for additional accounts. Forwarded to Alison.	0.10 165.00/hr	16.50
TM	Takeover Property Direction from Tom and Alison. Call to Hsu re site visit appointments.	0.10 165.00/hr	16.50
11/17/2015 <b>TM</b>	Takeover Property Email from Hsu re appointments in Arcadia re homes. Informed Tom.	0.10 165.00/hr	16.50
11/18/2015 TM	Takeover Property Received bank check from MetaBank. Made scan and copy of same. Email to Alison. Question from Alison, researched money from the bank. Found email to confirm entity. Email to Alison re same. Call from Alison re additional information from other bank and turnover request.	0.30 165.00/hr	49.50
TM	Takeover Property  Made tenant letters re visits to single family homes. Calls to and from Huron re same and discussed leases and useful items.	1.30 165.00/hr	214.50
11/19/2015 TM	Takeover Property Prepared map of USFIA related properties. Gathered items for visits to tenants.	0.30 165.00/hr	49.50
ТМ	Takeover Property Travel time to Alhambra Gardens, USFIA properties, and back; at half pay.	1.60 165.00/hr	264.00
ТМ	Takeover Property Visits to USFIA properties, left notices and spoke with one tenant along with Tim Hsu. Visited one property twice.	0.50 165.00/hr	82.50

## Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 88 of 113 Page ID #:2062

Thomas Seama	n, Receiver for Chen			Page	37
			Hrs/Rate	Amo	<u>unt</u>
11/20/2015 TI	M Takeover Property Received turnover check, copies to Alison.		0.10 165.00/hr	16	3.50
TI	Takeover Property Call from Hsu re properties visited. Discussed tenant.		0.10 165.00/hr	16	6.50
11/23/2015 T	M Takeover Property Looked up items for Tom re Alliance and other company of same name from entity documentation. Printed for him.		1.10 165.00/hr	181	1.50
11/24/2015 T	M Takeover Property Searched for info in entity documents related to Ally and reported to Tom.		2.00 165.00/hr	330	0.00
S	UBTOTAL:	[	22.90	3,79	5.00]
F	or professional services rendered		342.70	\$65,97	9.50
В	alance due		_	\$65,97	9.50

#### Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 89 of 113 Page ID #:2063

Thomas Seaman Company 3 Park Plaza Suite 550 Irvine, CA 92614

Invoice submitted to:
Thomas Seaman, Receiver for Chen

March 01, 2016

Invoice #11173

#### **Professional Services**

		Hrs/Rate	Amount
Acco	unting & Reporting		
12/1/2015 KJ	Accounting & Reporting put together monthly budget for Hills Garden, discussed with Darren, fine-tuned some accounting entries.	2.20 150.00/hr	330.00
12/2/2015 KJ	Accounting & Reporting entered remaining Hills Garden transactions for Nov, finalized books, got access to PMS1 system, ran and analyzed various reports produced the system, discussed Aprel, compared to the daily reports they send us in excel with revenue and deposits/AR, sent listing of inquiries to Aprel, booked month-end journal entries for Hills.	3.60 150.00/hr	540.00
12/3/2015 KJ	Accounting & Reporting cut checks	0.60 150.00/hr	90.00
12/4/2015 KJ	Accounting & Reporting cut check	0.20 150.00/hr	30.00
12/8/2015 KJ	Accounting & Reporting cut checks	2.20 150.00/hr	330.00
12/9/2015 KJ	Accounting & Reporting cut checks, entered hotel revenue/AR transactions	2.30 150.00/hr	345.00
12/10/2015 KJ	Accounting & Reporting cut checks and sent remaining property tax payments to various counties	1.10 150.00/hr	165.00

## Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 90 of 113 Page ID #:2064

Thomas Seaman, Receiver for Chen		Р	age 2
		Hrs/Rate	Amount
12/11/2015 KJ	Accounting & Reporting called Chase to pay/catch up on the Alhambra Gardens mortgage, emailed rep for various information to properly account for loan	0.60 150.00/hr	90.00
12/14/2015 KJ	Accounting & Reporting working with Aprel to correct some entries in the deposit schedule	1.80 150.00/hr	270.00
12/15/2015 KJ	Accounting & Reporting working with Aprel to correct most Accounts receivable entries which had been incorrect based on the customer payment checks received. Corrected all entries in Quickbooks's and properly applied the payments.	3.30 150.00/hr	495.00
12/16/2015 KJ	Accounting & Reporting Cut checks, did bank recons.	2.60 150.00/hr	390.00
12/17/2015 KJ	Accounting & Reporting cut checks	0.80 150.00/hr	120.00
12/18/2015 KJ	Accounting & Reporting cut checks, entered daily transactions for hotel revenue/hotel AR	2.40 150.00/hr	360.00
12/21/2015 KJ	Accounting & Reporting cut checks, working with merchant services to get funds turned over	1.20 150.00/hr	180.00
12/22/2015 KJ	Accounting & Reporting cut checks	0.40 150.00/hr	60.00
12/23/2015 KJ	Accounting & Reporting cut checks	2.40 150.00/hr	360.00
12/28/2015 KJ	Accounting & Reporting cut checks, working with merchant services to get frozen funds turned over	2.30 150.00/hr	345.00
12/29/2015 KJ	Accounting & Reporting cut checks, pulled and sent Darren some hotel/motel/hospitality financials for Hills Garden benchmarking purposes.	1.80 150.00/hr	270.00
12/30/2015 KJ	Accounting & Reporting cut checks, entered hotel revenue/AR	2.70 150.00/hr	405.00
12/2/2015 <b>M</b> RF	Accounting & Reporting Logged and deposited utility refunds and rent payments received. Made the accounting entries re same.	0.30 75.00/hr	22.50
12/4/2015 MRF	Accounting & Reporting Input the payroll for the period ending 11/30/15 for the Hills Garden Hotel.	0.60 75.00/hr	45.00

## Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 91 of 113 Page ID #:2065

Thomas Seaman, F	Receiver for Chen		F	Page	3
		Ḥ	irs/Rate	Amo	<u>ount</u>
12/4/2015 <b>M</b> RF	Accounting & Reporting Deposited funds turned over from Bank of America and discussed turnover of funds accounting for the Hills Garden Hotel with Kristen Janulewicz.		0.40 75.00/hr	30	0.00
12/14/2015 MRF	Accounting & Reporting Input December statement charges for the Alhambra apartment building and received tenant checks. Made the Quickbooks entries for rents received and deposited checks.		1.70 75.00/hr	12	7.50
12/17/2015 MRF	Accounting & Reporting Reviewed company Quickbooks files for details on insurances and broker contact info for Tim McDonnell.		0.50 75.00/hr	3.	7.50
MRF	Accounting & Reporting Input payroll for the period ending 12/15/15 to Quickbooks for the Hills Garden Hotel. Prepared and sent child support payment re same.		0.80 75.00/hr	6	0.00
SUBT	·OTAL:		38.80	5,49	7.50]
Invest	tor Relations	-			
12/1/2015 AJ	Investor Relations Review messages and correspondence from investors, etc.		0.90 190.00/hr	17	1.00
12/2/2015 AJ	Investor Relations Review messages and correspondence, including mail and email from investors. Emails with counsel as well re investor communications.		1.40 190.00/hr	26	6.00
12/3/2015 AJ	Investor Relations Review messages and correspondence.		1.10 190.00/hr	20	9.00
12/7/2015 AJ	Investor Relations Review messages and correspondence.		0.70 190.00/hr	13	3.00
12/8/2015 AJ	Investor Relations Review and respond to investor emails and correspondence		1.60 190.00/hr	30	4.00
12/11/2015 AJ	Investor Relations Review correspondence and messages.		0.70 190.00/hr	13	3.00
12/14/2015 AJ	Investor Relations Review messages and correspondence.		0.70 190,00/hr	13	3.00
12/18/2015 AJ	Investor Relations Reviewed messages and correspondence from investors, and other victims, former employees, etc.		1.20 190.00/hr	22	8.00

## Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 92 of 113 Page ID #:2066

Thomas Seam	nan, R	eceiver for Chen		Pag	e 4
			Hrs/Rate	<del></del> :	Amount
12/28/2015 A	٩J	Investor Relations Review messages and correspondence	0.70 190.00	/hr	133.00
A	ĄJ	Investor Relations Review messages, etc	0.30 190.00 <i>i</i>	/hr	57.00
12/29/2015 <i>A</i>	ĄJ	Investor Relations Review messages and correspondence.	0.50 190.00	/hr	95.00
12/30/2015 <i>A</i>	ÄJ	Investor Relations Review messages and correspondence. Email interesting message to Tom for possible follow up.	0.40 190.00		76.00
12/3/2015 1	ТМ	Investor Relations Email re translation services for web site. Prepared for posting.	0.30 165.00		49.50
5	SUBT	OTAL:	[ 10.50	1	1,987.50]
<u> </u>	Mana	ge Business			
12/1/2015 [	DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00		32.00
[	DC	Manage Business Reviewed payroll figures and verified; forwarded to Alison Juroe for processing.	0.30 160.00		48.00
Ę	DC	Manage Business Discussed civil penalty hearing with Tom Seaman.	0.10 160.00		16.00
	DC	Manage Business Met with Kristen Janulewicz regarding P&L for hotel and ongoing reporting of revenue; discussed accounts and ways to report revenue in light of delays with credit card processors and the fact that system did not go online until mid-month.	0.90 160.00		144.00
12/2/2015 I	DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting	0.20 160.00		32.00
I	DC	Manage Business Had call with Acara Johnson regarding another entity with account at SkyRiver besides hotel. Answered questions and sent additional paperwork.	0.30 160.00		48.00

## Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 93 of 113 Page ID #:2067

Thomas Seaman,	Receiver for Chen		Page 5
		Hrs/Rate	Amount
12/2/2015 DC	Manage Business Forwarded pay stubs for payroll to hotel manager.	0.10 160.00/hr	16.00
DC	Manage Business Had calls and email exchanges with hotel manager and rep from PMS1 regarding revenue reporting for hotel in prep for P&L meeting.	0.60 160.00/hr	96.00
DC	Manage Business Forwarded Magnuson invoice to Kristen Janulewicz.	0.10 160.00/hr	16,00
12/3/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
12/4/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
12/7/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel from weekend (and Friday). Scanned and saved to Receiver's files; forwarded to accounting.	0.40 160.00/hr	64.00
DC	Manage Business Reviewed reports sent by PMS1 and Magunsson regarding internet reservations of third party vendors.	0.30 160.00/hr	48.00
12/8/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hi	32.00
12/9/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hi	32.00
DC	Manage Business Reviewed Shift 4 reports.	0.30 160.00/hi	48.00
DC	Manage Business  Downloaded and reviewed new workers comp policy; verified payments sent and received. Scanned and saved to receiver's files and printed copy for hotel.	0.60 160,00/h	96.00
DC	Manage Business  Downloaded and reviewed new property and liability policy for hotel; verified payments sent and received. Scanned and saved to	0.60 160.00/h	96.00

Thomas Seaman, F	Receiver for Chen	Pa	age 6
	<u>-</u>	Hrs/Rate	Amount
	receiver's files and printed copy for hotel.		
12/9/2015 DC	Manage Business Printed documents and prepared for civil penalty hearing in San Bernardino in the morning.	0.60 160.00/hr	96.00
DC	Manage Business Talked with Aprel at hotel. Approved holiday brunch.	0.10 160.00/hr	16.00
12/10/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
DC	Manage Business Travel time to City Hall for hearing regarding Hotel operators permit.	0.80 160.00/hr	128.00
DC	Manage Business Travel time to City Hall for hearing regarding Hotel operators permit.	0.70 160.00/hr	112.00
DC	Manage Business Attended hearing for civil penalty for operating hotel without a permit; spoke at hearing to get penalty reduced and show appropriate paperwork and filings.	2.40 160.00/hr	384.00
DC	Manage Business Spent afternoon at hotel after civil penalty hearing. Reviewed health inspection documentation including certificated signed by alleged terrorist in San Brnardino. Instructed staff to remove certificate until new one was issued. Met with rep from Mercury Insurance regarding possible referrals of business customers. Reviewed new letterhead. Took photos and outlined initial plan for painting of lobby, breakfast room and elevator hallway.	2.60 160.00/hr	416.00
12/11/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
12/13/2015 DC	Manage Business Travel time to hotel for weekend visit.	0.60 160.00/hr	96.00
DC	Manage Business Travel time from hotel after weekend visit.	0.60 160.00/hr	96.00
DC	Manage Business Onsite at hotel reviewing initial punch list items from Day's Inn. Met with security guard; inspected new homeless camps around hotel. Sent photos to painting contractor prior to setting appointment for	2.00 160.00/hr	320.00

## Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 95 of 113 Page ID #:2069

Thomas Seaman, Receiver for Chen		Р	age 7
		Hrs/Rate	Amount
	painting bid.		
12/14/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel from weekend (and Friday). Scanned and saved to Receiver's files; forwarded to accounting.	0.40 160.00/hr	64.00
DC	Manage Business Reviewed reports sent by PMS1 and Magunsson regarding internet reservations of third party vendors.	0.30 160.00/hr	48.00
12/15/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
DC	Manage Business Working on comparative financial analysis of revenue and occupancy rates for 2012 through 2015.	1.50 160.00/hr	240.00
12/16/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
DC	Manage Business Reviewed payroll numbers, approved hours and overtime and forwarded to Alison Juroe.	0.20 160.00/hr	32.00
12/17/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
DC	Manage Business Had call with rep from Mercury Insurance regarding obtaining approved vendor status as hotel form temporary stays during insurance claim settlements and restoration for homeowner claims.	0.40 160.00/hr	64.00
DC	Manage Business Ran multiple industry reports for small hotels in Hoovers and analyzed. Compared to Hills Garden numbers.	1.20 160.00/hr	192.00
12/18/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
12/19/2015 DC	Manage Business Requested and received make and model numbers of broken ice makers for hotel. Researched ice machine vendors and possible	1.10 160.00/hr	176.00

## Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 96 of 113 Page ID #:2070

Thomas Seaman, Receiver for Chen		į	Page 8	I
		Hrs/Rate	Amount	
	solutions for problems with ice makers. Had call with Tim Jauch regarding possible repairs. Informed Tom Seaman of situation and preformed further research.			
12/20/2015 DC	Manage Business Drive time to hotel billed at half.	0.60 160.00/hr	96.00	ı
DC	Manage Business Drive time from hotel billed at half.	0.60 160,00/hr	96.00	,
DC	Manage Business Went to hotel to review preparations for Christmas and New Years. Inspected broken ice machines and took photos. Talked to multiple guests and inspected grounds. Checked up on homeless camps and took additional photos for painting contractor.	2.00 160.00/hr	320.00	
12/21/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel from weekend (and Friday). Scanned and saved to Receiver's files; forwarded to accounting.	0.40 160.00/hr	64.00	)
DC	Manage Business Reviewed reports sent by PMS1 and Magunsson regarding internet reservations of third party vendors.	0.30 160.00/hr	48.00	)
DC	Manage Business Had call with Josephine Zamora regarding transferring money into new account (credit card holding account). Requested proper form to facilitate transaction and gave to Kristen Janulewicz.	0.30 160.00/hr	48.00	)
DC	Manage Business Negotiated with SkyRiver and got clarification of amendment to internet contract. Agreed on payment terms to back out of prior contract and reduce internet from 100 meg to 20 meg. Arranged for wired payment with Kristen Janulewicz. Received amendment, obtained receiver signature, scanned and sent back.	0.60 160.00/hr	96.00	)
DC	Manage Business Received list of Insurance recommendations from Jeff Peng at Grosslight Insurance (property and liability). Had call with Aprel Glass to discuss implementation, progress and completion of items on list.	0.40 160.00/hr	64.00	)
12/22/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00	)
DC	Manage Business Discussed sick day, vacation pay and minimum wage increase with Aprel Glass. Created analysis of increasing all employees by \$1 an hour vs. raising just the employees below new minimum of \$10 per hour. Reviewed financial impact of each scenario (including taxes)	0.80 160.00/hr	128.00	)

## Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 97 of 113 Page ID #:2071

Thomas Seaman, Receiver for Chen		P	age 9
		Hrs/Rate	Amount
	and relayed information to Tom Seaman.		
12/23/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
DC	Manage Business Compiled financial analysis of hotel's performance using spreadsheets obtained from hotel for years 2012 through 2015. Made master spreadsheet comparing occupancy rate, average room rate, daily dollar total, monthly total, and yearly total. Showed trend for revenue and room rental over 4 year period and create graphical representation to highlight to receiver the dramatic drop in revenue after USFIA purchase illustrating the impact of removing the hotel's online presence, abandoning the Days Inn flag, changing rooms to offices, changing staff, and ending contracts with corporate accounts.	2.00 160.00/hr	320.00
12/24/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
12/25/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
12/27/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
12/28/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel from weekend (and Friday). Scanned and saved to Receiver's files; forwarded to accounting.	0.40 160.00/hr	64.00
DC	Manage Business Reviewed reports sent by PMS1 and Magunsson regarding internet reservations of third party vendors.	0.30 160.00/hr	48.00
DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00
DC	Manage Business Clarified billing procedure from Magnusson and relayed information to Kristen Janulewicz.	0.20 160.00/hr	32.00
12/29/2015 DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.	0.20 160.00/hr	32.00

Thomas Seam	nan, R	eceiver for Chen		P	age 10	
			<u></u>	-Irs/Rate	Amount	
12/29/2015 [	DC	Manage Business Called hotel to check after earthquake. Called Aprel Glass regarding potential damage.		0.20 160.00/hr	32.00	
Į.	DC	Manage Business Requested copies of all hotel financials from other receiverships.		0.10 160.00/hr	16.00	
12/30/2015 [	DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting.		0.20 160.00/hr	32.00	
I	DC	Manage Business Printed and reviewed financials from several hotels of other receiverships for comparison and analysis. Compared numbers to Hoovers reports as well as numbers for Hills Garden Hotel.		1.40 160.00/hr	224.00	
12/31/2015 [	DC	Manage Business Reviewed revenue and deposit worksheet from night manager for hotel. Scanned and saved to Receiver's files; forwarded to accounting		0.20 160.00/hr	32.00	
I	DC	Manage Business Worked on payroll for hotel. Requested holiday bonus information from Aprel Glass for prior years. Relayed information and figures to Tom Seaman along with financial impact; received bonus numbers from Tom and added to payroll. Relayed information to Alison Juroe and payroll company and Aprel Glass.	-	0.80 160.00/hr	128.00	
:	SUBT	OTAL:	[	36.30	5,808.00	i]
ļ	Projec	ct Management				
12/1/2015	AJ	Project Management Confer with Tom re real estate issues and mail, notices, etc		0.40 190.00/hr	76.00	,
12/2/2015	AJ	Project Management Received hotel payroll from Darren, review and send to Allied Accounting for processing.		0.10 190.00/hr	19.00	l
	AJ	Project Management Received payroll reports for hotel. Review revisions to hours and total amount due. Advise Tom re same and get approval. Email to Christine re payroll approved. Email to Darren, Matthew, and Kristen re same.		0.50 190.00/hr	95.00	i
	AJ	Project Management Review entity list and make corrections. Compare banking list to master and confer with Tim re same. Request he update both.		0.70 190.00/hr	133.00	)

Γhomas Seaman,	Receiver for Chen	Р	age 11
		Hrs/Rate	Amount
12/2/2015 AJ	Project Management Prepare email and letter to Chase per Tom's call with them re freeze and turnover demand.	0.50 190.00/hr	95.00
AJ	Project Management Open and review incoming correspondence and mail picked up from site. Confer with Tom and Tim re same.	1.60 190.00/hr	304.00
12/3/2015 AJ	Project Management Emails with David re gmail accounts. Look up info needed.	0.30 190.00/hr	57.00
AJ	Project Management Email from Chase re list of entities, send response to question.	0.10 190.00/hr	19.00
AJ	Project Management Received email from Tim Hsu with subpoena response from Porsche. Reviewed records.	0,80 190.00/hr	152.00
12/4/2015 AJ	Project Management Voice mail from Chase re records turnover. Calls with Chase rep to discuss accounts, timing, etc. Call with Tim re same. Advise re revisions to demand letter, etc. Review prior requests sent, etc.	1.70 190.00/hr	323.00
AJ	Project Management Email from Tim Hsu with additional submission from Porsche pursuant to subpoena.	0.20 190.00/hr	38.00
AJ	Project Management Review records in database. Confer with Tim re filing form 56's, etc.	0.30 190.00/hr	57.00
12/7/2015 AJ	Project Management Call with Ted re sale of La Presa house and Receivers lien. Search for banking records, and review files for info on purchase, remodel, etc. Run and review property profile, etc. Confer with Tom re same.	2.40 190.00/hr	456.00
12/8/2015 AJ	Project Management Search records and banking files for info related to La Presa. Confer with Tom re same	1.20 190.00/hr	228.00
AJ	Project Management Review email from Ted with Chase response to subpoena.	0.30 190.00/hr	57.00
12/9/2015 AJ	Project Management Review email from Tom re Chase mortgage. Confer with Tim re mortgage payment on apartment. Review bank records and locate mortgage statement. Provide to Tim with instruction to contact them immediately.	0.50 190.00/hr	95.00

Thomas Seaman, I	Receiver for Chen	Р	age 12
		Hrs/Rate	Amount
12/9/2015 AJ	Project Management Request to Tim to download PACER records to case file.	0.10 190.00/hr	19.00
LA	Project Management Provide direction to Matthew re scanning the Gainsborough property records into pub docs.	0.10 190.00/hr	19.00
AJ	Project Management Review employee file with H1-B work visa. Confer with Matthew re employee with special work visa. Request he research the employer obligations upon termination of employment. Review findings with Matthew. Confer with Tom and direct Matthew to draft a letter to DHS.	0.40 190.00/hr	76.00
AJ	Project Management Review latest filings in the SEC v. Chen matter.	1.70 190.00/hr	323.00
AJ	Project Management Review emails from Tim and Peter at Chase re mortgage payments, etc.	0.20 190.00/hr	38.00
12/14/2015 AJ	Project Management Call with Chase subpoena department. Discuss accounts, additional entities, etc. Prepare new letter and fax to subpoena department as directed.	0.90 190.00/hr	171.00
12/16/2015 AJ	Project Management Review email from Ted re wire instructions needed. Reply with same.	0.10 190.00/hr	19.00
AJ	Project Management Send payroll to accountant. Receive and review totals. Message Tom re amount and receive approval. Email to Christine to proceed with processing. Email to Darren, Kristin and Matt re same.	0.30 190.00/hr	57.00
AJ	Project Management Review mail and incoming correspondence, organize and respond to same.	0.80 190.00/hr	152.00
AJ	Project Management Review property tax info with Tim and Tom. Research names, address, etc.	0.60 190.00/hr	114.00
12/21/2015 AJ	Project Management Confer with Tom re meeting with Mo Chen again to discuss Amkey Global. Review emails from David Zaro re date/ time/ place. Prepare for meeting. Review bank records. Notes from previous meeting and records located at the Arcadia office.	2.40 190.00/hr	456.00
AJ	Project Management Review email from Ted with letter from Zhao's attorney. Discuss with Tom. Review files and docs related to same.	0.50 190.00/hr	95.00

Thomas Seaman, I	Receiver for Chen	Р	age 13
		Hrs/Rate	Amount
12/21/2015 AJ	Project Management Review email from Christine with questions on year end and new year payroll for hotel. Email Tom and Darren re same.	0.30 190.00/hr	57.00
AJ	Project Management Review messages and correspondence. Sort and organize mail, etc.	1.70 190.00/hr	323.00
12/22/2015 AJ	Project Management Onsite meeting in Arcadia with Mo Chen and counsel. Review documents and files in accounting department. Get records collected to bring to Irvine office. Gather and box up all mail delivered, etc.	8.60 190.00/hr	1,634.00
AJ	Project Management Travel time at 50% of time to Arcadia for meeting and review of records	0.80 190.00/hr	152.00
12/23/2015 AJ	Project Management Email from Tom with additional records from BRG. Attempt to download. Email Tom that I don't have access rights to the data.	0.20 190.00/hr	38.00
AJ	Project Management Continue to review books and records. Prepare response to Ted re Gainsborough property. Include recommendations for additional Subpoenas to issue.	3.70 190.00/hr	703.00
12/28/2015 AJ	Project Management Confer with Tom re Dominican Republic land purchases	0.20 190.00/hr	38.00
AJ	Project Management Email from payroll processor with deadlines payroll with upcoming holiday	0.10 190.00/hr	19.00
12/31/2015 AJ	Project Management Reveiw payroll. Emails with Darren re same. Email to payroll processor. Call with Christine re payroll. Email with Tom for approval on payroll. Email to all re same.	0.50 190.00/hr	95.00
12/2/2015 DC	Project Management Moved and organized files for USFIA brought back from Arcadia by Receiver.	0.60 160.00/hr	96.00
12/8/2015 DC	Project Management Had conference call with former owner of hotel and potential future buyer. Received and noted much information regarding past performance of hotel, staff insights, and possibility of repurchasing when receiver puts hotel for sale.	0.80 160.00/hr	128.00
12/9/2015 DC	Project Management Sent email to Betty Li (potential hotel buyer) and took call from Betty Li.	0.20 160.00/hr	32.00

## Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 102 of 113 Page ID #:2076

Thomas Seama	n, Receiver for Chen	Р	age 14
		Hrs/Rate	Amount
12/9/2015 De	C Project Management Update receiver on call from potential hotel buyer.	0.10 160.00/hr	16.00
12/2/2015 Ti	Project Management Edits to master list of entities and bank account list. Downloaded registration documents re entities.	2.50 165.00/hr	412.50
12/11/2015 TI	M Project Management Checkd for PACER docs.	0.10 165.00/hr	16.50
S	UBTOTAL:	[ 40.10	7,503.00]
<u>p</u>	roperty Management		
12/7/2015 D	C Property Management Reviewed weekly report and photos sent from golf course caretaker. Scanned and saved to receiver's files.	0.40 160.00/hr	64.00
12/14/2015 D	C Property Management Reviewed weekly report and photos sent from golf course caretaker. Scanned and saved to receiver's files.	0.40 160.00/hr	64.00
12/21/2015 D	C Property Management Reviewed weekly report and photos sent from golf course caretaker. Scanned and saved to receiver's files.	0.40 160.00/hr	64.00
12/28/2015 D	C Property Management Reviewed weekly report and photos sent from golf course caretaker. Scanned and saved to receiver's files.	0.40 160.00/hr	64.00
12/2/2015 T	M Property Management Received and filed proofs of service of tenant at 919 Fairview, Unit B. Email reply to attorney and email to Tom re same.	0.20 165.00/hr	33.00
Т	M Property Management Received numerous items of mail regarding the real estate from Tom. Received keys and direction re locks and landscaping. Separated out cell phone tower and golf course mail and gave to Darren.	0.20 165.00/hr	33.00
Т	M Property Management Approved invoices for utilities for AGA.	0.50 165.00/hr	82.50
Т	M Property Management Approved invoices for utilities for other properties.	0.50 165.00/hr	82.50
12/3/2015 T	M Property Management Discussed with Tom if any loan payments found for Alhambra Gardens.	0.10 165.00/hr	16.50

Page 15

		Hrs/Rate	Amount
12/3/2015 TM	Property Management Sorted emails re Alhambra Gardens and placed paper copies of contractor work, tenant correspondence in email folders and hard files.	0.50 165,00/hr	82.50
TM	Property Management Sorted and filed emails re insurance, property taxes, etc.	0.30 165.00/hr	49.50
ТМ	Property Management Call from boiler maintenance person. Gathered contact info, sent email re same.	0.20 165.00/hr	33.00
TM	Property Management Gathered info on property taxes for Tom and added information.	0.50 165.00/hr	82.50
ТМ	Property Management Discussion and email with Security Service re proposal.	0.80 165.00/hr	132.00
12/4/2015 TM	Property Management Approved invoice for insurance for Alhambra Gardens. Scanned documents related to same.	0.20 165.00/hr	33.00
ТМ	Property Management Discussed with Kristen need for Monday meeting with Tom re property taxes.	0.10 165.00/hr	16.50
ТМ	Property Management Reviewed email with roof repair invoice, pictures of repairs.	0.20 165.00/hr	33.00
TM	Property Management Email to laundry service re needs for new machines. Follow up calls re same.	0.50 165.00/hr	82.50
ТМ	Property Management Opened electrical account at 849 Balboa, informed Tom of pre-Receiver bill.	0.80 165.00/hr	132.00
TM	Property Management Approved utility bills.	0.20 165.00/hr	33.00
TM	Property Management Informed Tom of additional parcels found in review of tax records and bills.	0.10 165.00/hr	16.50
TM	Property Management Discussed security issue and utilities with Tom re Live Oak.	0.10 165.00/hr	16.50

Thomas Seaman,	Receiver for Chen	Р	age 16
		Hrs/Rate	Amount
12/4/2015 TM	Property Management Entered info to start budgets for properties.	0.40 165.00/hr	66.00
ТМ	Property Management Calls to Chase Bank re mortgage, transferred to two separate departments searching for information on mortgage and to whom to make payments. Told Tom re same when mortgage not confirmed on Alhambra Gardens. Work performed on Nov. 18, but inadvertently added later.	0.70 165.00/hr	115.50
12/7/2015 <b>TM</b>	Property Management Edits to utilities spreadsheet and email with direction to security guard service re reduction in utilities.	0.20 165.00/hr	33.00
ТМ	Property Management  Call from potential tenant and replied re no vacancy.	0.10 165.00/hr	16.50
ТМ	Property Management Received numerous gas account bills for Live Oak, put on spreadsheet for tracking, approved.	0.20 165.00/hr	33.00
ТМ	Property Management Received security service invoice, approved.	0.10 165.00/hr	16.50
TM	Property Management Discussed tax bills with Tom.	0.10 165.00/hr	16.50
ΉM	Property Management Call to laundry vendor at AGA re moving forward. Email from same.	0.20 165.00/hr	33.00
12/8/2015 TM	Property Management Review of laundry room upgrade estimates. Discussed with Tom, approved. Email to service re needs and timings.	0.90 165.00/hr	148.50
ТМ	Property Management Call from Whitfield, approved final payment for roof repair.	0.10 165.00/hr	16.50
TM	Property Management Gathered property tax info on various parcels of which we have not received bills.	1.70 165.00/hr	280.50
TM	Property Management Text to David re laundry equipment change out for Friday.	0.10 165.00/hr	16.50
12/9/2015 TM	Property Management Email from Tom re loan on AGA. Researched corporation and LLC records, downloaded recorded documents to discuss with Tom the order of the transactions.	0.60 165.00/hr	99.00

Thomas Seaman, I	Receiver for Chen	Pa	ige 17
		Hrs/Rate	Amount
12/9/2015 TM	Property Management Email from laundry vendor re installation, replies re availability of room, manager info.	0.20 165.00/hr	33.00
ТМ	Property Management Discussion with Alison re mortgage. Call to Chase re same for mortgage for Alhambra Gardens. Transferred to agent and LM with same re loan.	0.30 165.00/hr	49.50
ТМ	Property Management Prepared for meeting with Tom re property taxes. Had meeting and given direction re properties. Discussed need for frequent update of entities and availability of help on projects of tracking entities.	0.80 165.00/hr	132.00
ТМ	Property Management Research on property tax payments.	1.00 165.00/hr	165.00
ТМ	Property Management Call to landscaper re bills, entered onto spreadsheet. Email to same with direction.	0.40 165.00/hr	66.00
TM	Property Management Call to bank re loan payment, got directions to make payment, gave information to Kristen for payment.	0.30 165.00/hr	49.50
12/10/2015 TM	Property Management Looked up tax info on several parcels to determine if payment made previously. Discussed with Tom and arranged for payment with Kristen.	1.40 165.00/hr	231.00
12/11/2015 TM	Property Management Made pdfs and copies of property tax forms. Updated tracking spreadsheet re same.	0.20 165.00/hr	33.00
TM	Property Management Call to locksmith, arranged re-key. Gathered directions and printed.	0.20 165.00/hr	33.00
ТМ	Property Management Call from Whitfield re check.	0.10 165.00/hr	16.50
ТМ	Property Management Travel to Oak Mountain, Alhambra Gardens and back; at half pay.	1.50 165.00/hr	247.50
ТМ	Property Management Gathered laundry coins, checked on install of laundry equipment, call to installer re missing dryer. Gave petty cash to David re trash bags and stamps. Gathered rent checks. Checked on fumigation success.	0.50 165.00/hr	82.50
ŤΜ	Property Management Took pictures of property, met with locksmith and had locks changed. Discussed security with guardpost personnel. Checked all locks	1.80 165.00/hr	297.00

Thomas Seaman, I	Receiver for Chen	Р	age 18
		Hrs/Rate	Amount
	changed. Turned in receipt for locksmith.		
12/11/2015 TM	Property Management Scans and copies of checks, put away items from trip to Alhambra.	0.40 165.00/hr	66.00
12/14/2015 TM	Property Management Text to apartment manager re laundry people to come by and install third dryer.	0.10 165.00/hr	16.50
ТМ	Property Management Turned over Alhambra laundry revenues to Matthew for deposit.	0.10 165.00/hr	16.50
ТМ	Property Management Update from Matthew re payments of several renters.	0.10 165.00/hr	16.50
ТМ	Property Management Call with security service re upgrades.	0.20 165.00/hr	33.00
12/15/2015 T <b>M</b>	Property Management Call from tenant re rent payment, need to unclog drain. Text to handyman. Text from apartment manager re installation of laundry equipment.	0.20 165.00/hr	33.00
ТМ	Property Management Call from laundry vendor re install and new invoice. Discussed needed work.	0.20 165.00/hr	33.00
12/16/2015 TM	Property Management Received revised invoice which reflects the difference in equipment, reviewed and emailed question to Wray re coin kits. Received new email but same invoice. Replied re same.	0.20 165.00/hr	33.00
TM	Property Management Review of needed insurances, search for trust deed records.	0.50 165.00/hr	82.50
12/17/2015 TM	Property Management Discussed with Tom insurance issues. Researched financial records for insurance information. Plotted known parcels on map. Checked against grant deed information.	4.20 165.00/hr	693.00
TM	Property Management Call from security re need for additional line.	0.10 165.00/hr	16.50
12/18/2015 TM	Property Management Received bill re SCE, checked against payments, call to SCE re same to confirm zero balance.	0.10 165.00/hr	16.50
ТМ	Property Management Received bill re SoCalGas, checked against payments, call to SoCalGas re same to confirm zero balance. Checked with Kristen re	0.20 165.00/hr	33.00

Thomas Seaman, I	Receiver for Chen	Р	age 19
		Hrs/Rate	Amount
	payment made.		
12/18/2015 TM	Property Management Emails from security re invoices, investigated and approved two.	0.20 165.00/hr	33.00
ТМ	Property Management Call from security re set up of security system.	0.10 165.00/hr	16.50
TM	Property Management Set up water and electricity accounts for 345 Oak Mountain.	0.70 165.00/hr	115.50
12/21/2015 TM	Property Management Approved invoices for landscaping for Alhambra Gardens.	0.30 165.00/hr	49.50
ТМ	Property Management Email from tenant M re needed repairs. Saved pictures. Call to apartment manager and handyman to fix immediately. Texted.	0.20 165.00/hr	33.00
TM	Property Management Email from pipe technician company re bid for work at Alhambra Gardens, saved contacct info, bid, printed for review.	0.20 165.00/hr	33.00
ТМ	Property Management Email to security person re system set up and codes.	0.10 165.00/hr	16.50
ТМ	Property Management Checked on payment to SoCalGas with Kristen.	0.10 165.00/hr	16.50
TM	Property Management Approved invoices for landscaping for 135 Live Oak. Scanned, approved, copies to Kristen for payment.	0.30 165.00/hr	49.50
ТМ	Property Management Review of invoices for landscaping for 4050 & 4116 Lynd. Scanned, attempted to check against Quickbooks.	0.40 165.00/hr	66.00
ТМ	Property Management LM with Storch re insurance quotes.	0.10 165.00/hr	16.50
12/23/2015 T <b>M</b>	Property Management Call from handyman re Apartment M work to be done. Received picture list of items to be fixed. Approved bathtub shower door, knob work. Approved new bathroom vanity and unclogging of sink. Review list of other items. Instructions to handyman by text.	0.50 165.00/hr	82.50
ТМ	Property Management Search through past bills to determine telephone and internet capabilities.	0.50 165.00/hr	82.50

## Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 108 of 113 Page ID #:2082

Thomas Seaman, Receiver for Chen					age '	20
			<u> </u>	rs/Rate	Amo	ount
12/23/2015	TM	Property Management San Bernardino housing discussion with Darren re marketing hotel.		0.20 165.00/hr	33	3.00
12/29/2015	ТМ	Property Management Call from handyman at AGA re faucet needing replacement and toilet clog. Text to apartment manager re same. Text to handyman to approve.		0.20 165.00/hr	33	3.00
12/30/2015	TM.	Property Management Call from Storch re items needed for proposal.		0.10 165.00/hr	16	5.50
,	TM	Property Management Discussed landscaper costs at main property with Tom. Discussed other items needed for security.		0.10 165.00/hr	16	3.50
	SUBT	OTAL:	[	32.60	5,37	1.00]
	<u>Recei</u>	ver				
12/1/2015	TAS	Receiver Review extracted files		1.60 375.00/hr	600	0.00
	TAS	Receiver Organize material retrieved from site, Meet with Tim re real estate issues, keys, insurance, utilities, notices, confer with Alison re same and mail		0.70 375.00/hr	26	2.50
	TAS	Receiver Read and comment on emails re USFIA Singapore, confer re next steps		0.40 375.00/hr	15	0.00
12/2/2015	TAS	Receiver Travel time at 50% of time to Arcadia to bank and company offices		0.70 375.00/hr	26	2.50
	TAS	Receiver Meet at bank view safety deposit contents		0.50 375.00/hr	18	7.50
	TAS	Receiver Review records at company offices, take bankers boxes of bank bank statements, review mail		1.30 375.00/hr	48	7.50
	TAS	Receiver Telephone call with David re safety deposit box, etc		0.30 375.00/hr	11	2.50
	TAS	Receiver Telephone call with Dana at Chase re freeze order and account identifiers		0.30 375.00/hr	11	2.50

Thomas Seaman, I	Receiver for Chen	F	age 21
		Hrs/Rate	Amount
12/2/2015 TAS	Receiver Travel time at 50% of time from Arcadia	0.50 375.00/hr	187.50
TAS	Receiver Telephone call with counsel re accounting, assets	0.40 375.00/hr	150.00
TAS	Receiver Review confer re emails from USFAI Singapore counsel	0.40 375.00/hr	150.00
TAS	Receiver Direct Matt re files retrieved from Arcadia	0.20 375.00/hr	75.00
12/3/2015 TAS	Receiver Go to bank re check for Cloverly landlord	0.50 375.00/hr	187.50
TAS	Receiver Review and retrieve banking records	1.60 375.00/hr	600.00
TAS	Receiver Telephone call with David Zaro re Zhao, safety deposit box, additional accounts	0.30 375.00/hr	112.50
12/9/2015 TAS	Receiver Read and consider Zaho opposition	0.80 375.00/hr	300.00
TAS	Receiver Meet re property taxes	0.70 375.00/hr	262.50
TAS	Receiver Confer re additional evidence on real estate assets	0.50 375.00/hr	187.50
TAS	Receiver Phone interview with San Berardino Police re background check and interview	0.50 375.00/hr	187.50
TAS	Receiver Review and sign checks for hotel bills, review cash position	0.30 375.00/hr	112.50
12/10/2015 TAS	Receiver Deal with property tax issues and which ones to pay	1.40 375,00/hr	525.00
TAS	Receiver Read and revise letter to Homeland Security re termination of employee with visa	0.30 375.00/hr	112.50
12/14/2015 TAS	Receiver Review email re turnover of funds frozen by FBI, Telephone call with David re same and complete form	0.40 375.00/hr	150.00

Thomas Seaman, Receiver for Chen			Page 22			22
				Hrs/Rate	Am	<u>ount</u>
12/14/2015	TAS	Receiver Confer with Alison re Chase accounts, subpoena, additional accounts, timeframe		0.20 375.00/hr	7	5.00
12/16/2015	TAS	Receiver Telephone call with David re list of things to ask Mo Chen for in advance of meeting		0.30 375.00/hr	11	2.50
12/17/2015	TAS	Receiver Confer with Tim re insurance		0.20 375.00/hr	7	5.00
-	TAS	Receiver Telephone call with David re Amkey Global		0.30 375.00/hr	11	2.50
12/22/2015 <sup>-</sup>	TAS	Receiver Travel time at 50% of time to Arcadia		0.60 375.00/hr	22	5.00
-	TAS	Receiver  Meet at site with Mo Chen and counsel Tom Zaccaro; review documents and mail		2.20 375.00/hr	82	5.00
-	TAS	Receiver Confer with Darrren re minimum wage and related issues		0.20 375.00/hr	7	'5.00
12/23/2015	TAS	Receiver Travel time at 50% of time to Irvine from Arcadia		0.60 375.00/hr	22	25.00
-	TAS	Receiver Reviiew data extracted by IT		0.70 375.00/hr	26	32.50
12/28/2015 <sup>-</sup>	TAS	Receiver Confer with Alison re Dominican Republic land purchase contract		0.20 375.00/hr	7	'5.00
12/31/2015	TAS	Receiver Review last year's bonus, calculate and give direction re Christmas bonus		0.30 375.00/hr	11	2.50
;	SUBT	TOTAL:	[	20.40	7,65	50.00]
!	Recei	ivership Administration				
12/2/2015	MRF	Receivership Administration Spoke with Thomas Seaman re storage of files from Live Oak at Irvine office. Cleared space for files and moved boxes into office.		0.80 75.00/hr	6	80.00
12/3/2015	MRF	Receivership Administration Moved files taken from Live Oak up to Irvine office, created files and began filing documents.		1.30 75.00/hr	ę	97.50

Thomas Seaman, Receiver for Chen				P	age '	23
			!	Hrs/Rate	Am	ount
12/4/2015	MRF	Receivership Administration Continued filing entity documents taken from Live Oak offices.		0.30 75.00/hr	2	2.50
12/9/2015	MRF	Receivership Administration Received directions from Alison Juroe and scanned/filed documents relating to the Gainsborough property.		0.80 75.00/hr	6	0.00
	MRF	Receivership Administration Received directions and researched employer obligation when terminating an employee on a H1-B Work Visa. Spoke with Alison Juroe re notification requirements.		0.80 75.00/hr	`6	0.00
12/10/2015	MRF	Receivership Administration  Downloaded documents received from legal counsel, stored and labeled on company servers.		0.40 75.00/hr	3	0.00
	MRF	Receivership Administration Sorted mail and bank statements taken from Live Oak offices.		0.30 75.00/hr	2	2.50
	MRF	Receivership Administration Drafted letter to USCIS re notification of termination of H1-B Visa employee. Revised per Thomas Seaman's instructions, finalized, and sent out.	i	0.90 75.00/hr	6	7.50
	MRF	Receivership Administration Received call from the attorney for the tenant of 919 Fairview property, took message and forwarded to Thomas Seaman.		0.20 75.00/hr	1	5.00
12/29/2015	MRF	Receivership Administration Filed payables and company documents received from Live Oak offices.		0.40 75.00/hr	3	0.00
	SUBT	OTAL:	[	6.20	46	5.00]
	Resea	arch files				
12/1/2015	AJ	Research files Review files, documents, and bank records.		2.50 190.00/hr	47	5.00
12/3/2015	AJ	Research files Continue to review bank records, and other files and records.		3.70 190.00/hr	70	3.00
12/11/2015	AJ	Research files Review files and documents, bank records, etc. Research property files, entity info, etc.		2.40 190.00/hr	45	6.00

Thomas Seaman, Receiver for Chen			
		Hrs/Rate	Amount ,
12/16/2015 AJ	Research files Review bank records, files, etc.	2.90 190.00/hi	551.00
12/17/2015 AJ	Research files Continue to review bank records and books and records. Emails with counsel re subpoenas, etc.	5.40 190.00/hi	1,026.00
12/28/2015 AJ	Research files Review records and files. Look into the purchase of lots in the Dominican Republic. Research same.	3.00 190.00/hi	570.00
12/29/2015 AJ	Research files Review property records, escrow payments, etc	1.20 190.00/h	228.00
12/30/2015 AJ	Research files Continue to research bank records, documents, files, property records, etc	1.70 190.00/h	323.00
12/23/2015 <b>M</b> R	<ul> <li>Research files</li> <li>Reviewed company files taken from Live Oak offices, labeled and filed.</li> </ul>	1.90 75.00/h	142.50
SU	BTOTAL:	[ 24.70	4,474.50]
<u>Tak</u>	reover Property		
12/1/20 <b>1</b> 5 T <b>M</b>	Takeover Property  Letter to brokerage firm re accounts. Call to brokerage, faxed info.  Significant edits to accounts list. Gathered confirmation of sending and filed.	2.10 165.00/h	346.50 r
12/3/2015 TM	Takeover Property Research into potential properties. Found spreadsheet re same and added to it.	0.70 165.00/h	115.50 r
12/4/2015 TM	Takeover Property  Made letter of bank records request per Alison. Search of entity documents to gather Tax ID info, discussed with Alison.	1.10 165.00/h	181.50 r
TM	Takeover Property Direction from Alison re Form 56's.	0.10 165.00/h	16.50 r
12/9/2015 T <b>M</b>	Takeover Property Call from Alison re new PACER documents to download. Downloaded and notified Alison.	0.30 165.00/h	49.50 r

## Case 2:15-cv-07425-RGK-PLA Document 74 Filed 04/04/16 Page 113 of 113 Page ID #:2087

Thomas Seaman, Receiver for Chen			
		Hrs/Rate	Amount
12/9/2015 TM	M Takeover Property Research on Longtai, call to same.	0.50 165.00/	82.50 hr
12/16/2015 TM	M Takeover Property Reviewed potential properties found. Reviewed property taxes paid. Discussed with Alison and Tom the property in Nevada.	0.70 165.00/	115.50 hr
12/17/2015 TM	Takeover Property Email to Darren re potential RV at golf course.	0.20 165.00/	33.00 hr
12/19/2015 TM	M Takeover Property Checked for new documents on PACER.	0.10 165.00/	16.50 hr
12/23/2015 TM	Takeover Property Letter to postmaster re change of address.	0.50 165.00/	82.50 hr
12/31/2015 TM	M Takeover Property Made letters for banks re potential accounts. Faxed, mailed, Fed Ex'd and hand delivered same.	3.50 165.00/	577.50 hr
St	UBTOTAL:	[ 9.80	1,617.00]
Fo	or professional services rendered	219.40	\$40,373.50
Ва	alance due		\$40,373.50